

Environmental Protection Agency Internet Information

EPA Region 2

While Freedom of Information Act (FOIA) requests will be honored by directly writing to Region 2, EPA provides an increasing amount of environmental media information, and other Regional activities via Internet at <http://www.epa.gov>.

Region 2 has provided a FOIA Web site <http://www.epa.gov/region02/foia/> with several online databases from which the environmental information can be retrieved.

- **"Frequently FOIAed Files"** Web site <http://www.epa.gov/region02/foia/fff.htm> covers RCRA and many other media Programs. Through this Web site, you can learn about each media Program, associated databases, and special points of interest. In particular, the ability to "directly download" all of the most commonly requested Region 2 Export Files (.xls) and Reports (.pdf) - all compressed for quicker downloading.

EPA Region 2 has established a **list of contaminated facilities** that are a high priority for cleanup in New York, New Jersey, Puerto Rico and the U.S. Virgin Islands. You can view each facility fact sheet at <http://www.epa.gov/region02/cleanup/sites/>

EPA- Headquarters

- **Envirofacts Data Warehouse** Web site <http://www.epa.gov/enviro/index.html> is a one-stop source to the environmental information. This Web site provides access to several EPA databases with information about environmental activities that may affect air, water and land anywhere in the United States.
- **"My Environment"** Web site <http://www.epa.gov/myenvironment> is a powerful tool that provides a wide range of federal, state and local information about environmental conditions and futures in an area of your choice.
- **The Enforcement and Compliance History Online (ECHO)** Web site <http://www.epa.gov/echo/> provides a list of all inspections and enforcement under most of the environmental statutes.
- **Right-To-Know Network (RTK Net)**, a non-EPA Web site <http://www.rtknet.org/> on-line query engine provides free access to numerous databases and resources on environment.
- **National Biennial RCRA Hazardous Waste Report** Web site <http://www.epa.gov/epaoswer/hazwaste/data/biennialreport/index.htm> provides documents and data on hazardous waste reports.
- **Conditionally Exempt Small Quantity Generators** Web site <http://www.epa.gov/osw/hazard/generation/cesqg.htm> provides information on Conditionally Exempt Small Quantity Generators.

FOIA # EPA-R2-2014-008065

For further information on solid waste, please contact the State of New Jersey at the enclosed address as it is responsible for keeping records related to solid waste.

Mr. Robert Confer, Bureau Chief, New Jersey Department of Environmental Protection, Bureau of Landfill and Hazardous Waste Permitting, 401 East State Street, CN 414, Trenton, NJ 08625-0414, Telephone # (609) 984-6985, and Fax # (609) 633-9839.

We checked with our air programs office, and they do not have any responsive records concerning your request.



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

04/04/94

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ->	NJD002173151
FACILITY NAME ->	CYTEC INDUSTRIES INC
MAILING ADDRESS ->	35 CUTTERS DOCK RD WOODBIDGE, NJ 07095
INSTALLATION ADDRESS ->	35 CUTTERS DOCK RD WOODBIDGE, NJ 07095

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

ATTN: AIR & WASTE MANAGEMENT DIVISION, ROOM 1006
HAZARDOUS & SOLID WASTE PROGRAMS BRANCH
RCRA NOTIFICATIONS

TO: BERRIAN, JON
PLT MGR
CYTEC INDUSTRIES INC
35 CUTTERS DOCK RD
WOODBIDGE, NJ 07095

CYTEC

CYTEC INDUSTRIES INC.

Woodbridge Plant
35 Cutters Dock Road
Woodbridge, NJ 07095
Tel: (908) 634-3800
Fax: (908) 634-8326

February 9, 1994

US EPA REGION II
Air & Waste Management Division
Attn: RCRA Notifications
26 Federal Plaza, Room 505
New York, New York 10278

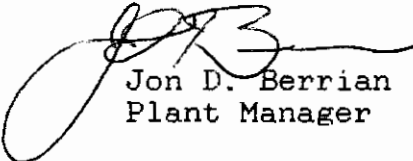
Ref: EPA ID # NJD002173151

Dear Sir:

On December 17, 1993, American Cyanamid Company completed the "spin-off" of its chemicals businesses as a new company, named Cytec Industries Inc. Enclosed is a completed Form 8700-12, "Notification of Regulated Waste Activity," which provides updated information for the Woodbridge, New Jersey facility.

If you have any questions or comments, please call me at (908) 634-3800.

Very truly yours,
CYTEC INDUSTRIES INC.



Jon D. Berrian
Plant Manager

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

**EPA**

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)ENVIRONMENTAL PROTECTION
AGENCY REGION II

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(complete item C)C. Installation's EPA ID Number
N J D 0 0 1 2 4 4 7 0 3 1 2 5 1

II. Name of Installation (Include company and specific site name)

C Y T E C I N D U S T R I E S I N C .

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

3 5 C U T T E R S D O C K R O A D

Street (continued)

City or Town

W O O D B R I D G E

State

N J

ZIP Code

0 7 0 9 5 -

County Code

County Name

M I D D L E S E X

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

3 5 C U T T E R S D O C K R O A D

City or Town

W O O D B R I D G E

State

N J

ZIP Code

0 7 0 9 5 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

B E R R I A N

(first)

J O N

Job Title

P L A N T M A N A G E R

Phone Number (area code and number)

9 0 8 - 6 3 4 - 3 8 0 0

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing☒☐

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

C Y T E C I N D U S T R I E S I N C .

Street, P.O. Box, or Route Number

5 G A R R E T M O U N T A I N P L A Z A

City or Town

W E S T P A T E R S O N

State

N J

ZIP Code

0 7 4 7 0 -

Phone Number (area code and number)

2 0 1 - 3 5 7 - 3 1 0 0

B. Land Type

P

C. Owner Type

P

D. Change of Owner

Indicator

Yes X No

(Date Changed)

Month Day Year

1 2 1 7 9 3

1D - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities
1. Generator (See instructions) <input checked="" type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.) <input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.) <input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)	<input type="checkbox"/> 3. Trailer, Storage, Disposer (at installation) Note: A permit is required for this activity; see instructions. <input type="checkbox"/> 4. Hazardous Waste Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketers <input type="checkbox"/> c. Boiler and/or Industrial Furnace <input type="checkbox"/> 1. Smelter Refractory <input type="checkbox"/> 2. Small Quantity Exemption Indicate Type of Combustion Device(s) <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input type="checkbox"/> 5. Underground Injection Control	1. Off-Specification Used Oil Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketers <input type="checkbox"/> c. Burner - Indicate device(s) - Type of Combustion Device <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input type="checkbox"/> 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification
2. Transporter (Indicate Mode in boxes 1-5 below) <input type="checkbox"/> a. For own waste only <input type="checkbox"/> b. For commercial purposes Mode of Transportation <input type="checkbox"/> 1. Air <input type="checkbox"/> 2. Rail <input type="checkbox"/> 3. Highway <input type="checkbox"/> 4. Water <input type="checkbox"/> 5. Other - specify _____		

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	* <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
* <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7	8	9	10	11	12
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See instructions.)

1	2	3	4	5	6
X 0 0 3	X 0 0 1	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (type or print)

Date Signed

JON D. BERRIAN - PLANT MANAGER

2/7/94

XI. Comments

* VARIOUS D,P AND U WASTES IN LAB PACKS, CANNOT BE PREDICTED.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•NJ0002173151

INSTALLATION ADDRESS

AMERICAN CYANAMID CO
PO BOX 8
WOODBIDGE

NJ

07095

CUTTERS DOCK RD
WOODBIDGE

NJ

07095



American Cyanamid Company
Industrial Products Division
P.O. Box 8
Woodbridge, NJ 07095
(201) 634-3800
Registered - Return Receipt

PA3
AUG 3 2 1982
NEW YORK, NY 10001

NJD 002173151

July 30, 1982

84
HDDMS
10/5/82
file

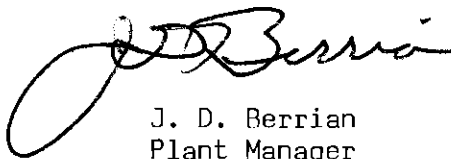
United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Sir:

In accordance with the requirement to submit annual reports covering hazardous waste activities during calendar year 1981, enclosed are copies of annual reporting forms 8700-13, 13A and 13B. We are submitting the annual report in this form because we understand that there are no OMB approved forms for such reporting.

This submission and any past or future communications or discussions regarding this matter are not intended to admit any fact or liability or to waive or affect any rights.

Very truly yours,


J. D. Berrian
Plant Manager

JDB/ms
encl.

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE REPORT		I. TYPE OF HAZARDOUS WASTE REPORT	
PLEASE PLACE LABEL IN THIS SPACE		PART A: GENERATOR ANNUAL REPORT	
		THIS REPORT IS FOR THE YEAR ENDING DEC. 31, 1981	
		PART B: FACILITY ANNUAL REPORT	
		THIS REPORT FOR YEAR ENDING DEC. 31, 1981	
		PART C: UNMANIFESTED WASTE REPORT	
		THIS REPORT IS FOR A WASTE RECEIVED (day, mo., & yr.)	
INSTRUCTIONS: You may have received a preprinted label attached to the front of this pamphlet; affix it in the designated space above-left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing this form. The information requested herein is required by law (Section 3002/3004 of the Resource Conservation and Recovery Act).			
II. INSTALLATION'S EPA I.D. NUMBER			
F N J D O Q 2 1 7 3 1 5 1 1			
III. NAME OF INSTALLATION			
AMERICAN CYANAMID COMPANY			
IV. INSTALLATION MAILING ADDRESS			
STREET OR P.O. BOX			
3 P O BOX 8			
CITY OR TOWN			
WOODBRIDGE			
ST. ZIP CODE			
NJ 07095			
V. LOCATION OF INSTALLATION			
STREET OR ROUTE NUMBER			
5 CUTTERS DOCK RD			
CITY OR TOWN			
WOODBRIDGE			
ST. ZIP CODE			
NJ 07095			
VI. INSTALLATION CONTACT			
NAME (last and first)			
2 J O N B E R R I A N			
PHONE NO. (area code & no.)			
201-634-3800			
VII. TRANSPORTATION SERVICES USED (for Part A reports only)			
List the EPA Identification Numbers for those transporters whose services were used during the reporting year represented by this report.			
NONE			
VIII. COST ESTIMATES FOR FACILITIES (for Part B reports only)			
A. COST ESTIMATE FOR FACILITY CLOSURE		B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE (disposal facilities only)	
G NA \$		NA \$	
IX. CERTIFICATION			
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.			
John D. Berrian		7/30/82	
A. PRINT OR TYPE NAME		B. SIGNATURE	
		C. DATE SIGNED	

Please print or type with ELITE type (12 characters/inch).

GSA No. 12345-XX
Form Approved OMB No. 158-R00XX

EPA		U.S. ENVIRONMENTAL PROTECTION AGENCY	
GENERATOR ANNUAL REPORT - PART A			
(Collected under the authority of Section 3002 of RCRA.)			
FOR OFFICIAL USE ONLY (Items 1 and 2)		1. DATE RECEIVED	X. GENERATOR'S EPA LD. NO.
		2. TYPE OF REPORT	
XI. FACILITY'S EPA I.D. NO.		XIII. FACILITY ADDRESS (street or P.O. box, city, state, & zip code)	
NJDO02173151		Cutters Dock Rd Woodbridge, N.J. 07095	
XII. FACILITY NAME (specify)			
American Cyanamid Co.			
XIV. WASTE IDENTIFICATION			
LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (see instructions)
1	NONE		
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
XV. COMMENTS (enter information by line number - see instructions)			
No hazardous wastes were generated, treated, stored or disposed of in 1981.			

Please print or type with ELITE type (12 characters/inch).

GSA No. 12345-XX
Form Approved DMB No. 155-RD0XX

EPA		U.S. ENVIRONMENTAL PROTECTION AGENCY FACILITY REPORT - PARTS B & C (Collected under the authority of Section 3004 of RCRA.)			
FOR OFFICIAL USE ONLY (Items 1 & 2)		I. DATE RECEIVED 11 19			
II. RECEIVED BY		XVI. TYPE OF REPORT (enter an "X") <input checked="" type="checkbox"/> PART B <input type="checkbox"/> PART C			
XVIII. GENERATOR'S EPA I.D. NO. NJ 000 21 731 51		XVII. FACILITY'S EPA I.D. NO. GNJD 002 1731 51			
XIX. GENERATOR NAME (Specify) American Cyanamid Company		XX. GENERATOR ADDRESS (street or P.O. box, city, state, & zip code) Cutters Dock Rd Woodbridge, N.J. 07095			
XXI. WASTE IDENTIFICATION					
LINE NUMBER	A. DESCRIPTION OF WASTE	B. EPA HAZARDOUS WASTE NUMBER (see instructions)	C. HANDLING METHOD (enter code)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (enter code)
1	NONE				
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
XXII. COMMENTS (enter information by line number - see instructions) No hazardous wastes were generated, treated, stored or disposed of in 1981.					



P. O. Box 8
Woodbridge, NJ 07095

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 14, 1980

EPA Region II
Information Service Plaza
26 Federal Plaza
New York, NY 10007

Dear Mr. Ruisi:

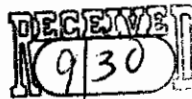
Attached herewith is Part A, Application for a Hazardous Waste Permit for the Woodbridge plant in accordance with the regulations contained in EPA's Consolidated Permits Program.

This submission or any past or future discussions or communication with respect to this matter is not intended to admit any liability or to waive any rights.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Jon Berrian', written over a horizontal line.

Jon Berrian
Plant Manager



NSD002173151

Barbara - forward
to PAB after
your use
To

American Cyanamid Company
Industrial Products Division
P.O. Box 8
Woodbridge, NJ 07095
(201) 634-3800

Sept. 22, 1983

Mr. Conrad Simon, Director
Air & Waste Management Div.
U. S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, N. Y. 10278

Re: Request for Information dated Sept. 1, 1983 under 42 U.S.C. 6927

Dear Mr. Simon:

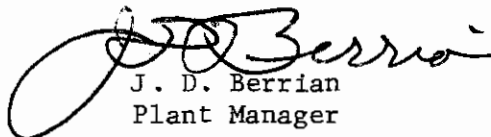
The Woodbridge plant of American Cyanamid Company has been deleted as a TSD facility. Enclosed for your use is a copy of the letter sent to Mr. Ruisi, EPA, on November 13, 1981, requesting that our RCRA Part A application be withdrawn. Also enclosed is a copy of the letter from Mr. Baker, Chief, Permits Administration Branch, EPA, acknowledging that the facility had been removed from regulation under RCRA.

The Woodbridge plant has never operated as a TSD facility under RCRA per the explanation in our letter of November 13, 1981. Therefore, the submittal of closure and post-closure plans and estimates is not appropriate for the Woodbridge plant.

We hope this will respond to your inquiry of Sept. 1, 1983. If you have any questions please call the undersigned at 201-634-3800.

Very truly yours,

AMERICAN CYANAMID COMPANY


J. D. Berrian
Plant Manager

JDB:1

Encl.



AMERICAN CYANAMID COMPANY
Industrial Products Division
P. O. Box 8
Woodbridge, NJ 07095
(201) 634-3800

TO: J. BERRIAN
1 OF 7

November 13, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

EPA Region II
Information Service Plaza
26 Federal Plaza
New York, N. Y. 10007

RE: NJD002173151

Dear Mr. Ruisi:

We herewith request cancellation of the above referenced HCRA interim status (Part A) application.

On November 14, 1980, American Cyanamid Company's Woodbridge Plant (EPA I.D. Number NJD002173151) submitted a Part A, Application for Hazardous Waste Permit to your office in accordance with the EPA's Consolidated Permits Program regulations.

This permit application specifically listed the following as the hazardous waste storage and treatment operations at Woodbridge:

Storage

S01	Containers	11,000 gallons
S04	Surface Impoundment	400,000 gallons

Treatment

T04	Other	100 gallons per day
T04	Other	(Included with S04 above.)

Several of the manufacturing operations at the Woodbridge Plant have either permanently ceased or have been modified since our previous November, 1980 application submittal, thus making Woodbridge's status as a Part A Hazardous Waste Facility no longer appropriate. Since last November, the following changes have taken place at the plant:

1) The storage in containers (301) of contaminated drum liners from the manufacture of vanadium pentoxide catalyst no longer occurs. Production of vanadium pentoxide catalyst at Woodbridge was terminated in February, 1981. Also, a non-hazardous determination for vanadium pentoxide catalyst was postulated by The Fertilizer Institute (McKenna, Conner and Cuneo Law Offices report to Mr. K. T. Johnson, The Fertilizer Institute, June 22, 1981) with which the EPA has concurred. The catalyst was determined to be non-hazardous because: (a) the waste is not pure or off-specification vanadium pentoxide and should not be designated as P120, (b) spent catalyst is not a listed hazardous waste (Sections 261.31 to 261.33), and (c) the catalyst does not have any of the four hazardous waste characteristics (Sections 261.21 to 261.24).

Therefore, since 1) vanadium pentoxide catalyst has received a non-hazardous classification and 2) the Woodbridge Plant no longer produces this material, the Part A RCRA application no longer applies to this operation.

2) The operation listed as 'other treatment' (T04) on the Woodbridge application pertained to a drum washout station where empty formaldehyde (U122) drums were to be cleaned. The production of formaldehyde-containing products at Woodbridge is such that at a maximum only two empty formaldehyde drums per year will be washed out at this station. The hazardous wastes generated by this operation would, therefore, qualify under the small quantity generator exclusion, Section 261.5 of the RCRA regulations. Again, the Part A RCRA status is not necessary for this minimal waste generation. To date no formaldehyde drums have been washed out.

3) The surface impoundment storage (S04) and associated other treatment (T04) noted in our application refers to the on-site 400,000 gallon impoundment is used for effluent equalization and pH adjustment prior to final treatment of the waste at the Woodbridge Township Publically Owned Treatment Works (POTW). Our Part A application listed formaldehyde (U122) from the drum washout station, and ignitable (D001), corrosive (D002), reactive (D003), and acrylonitrile (U009) wastes from spill clean-up as the hazardous waste constituents which could enter the surface impoundment.

As noted in No. 2 above, a minimal amount of formaldehyde from drum washout (e.g. two drums per year at a maximum) will enter the surface impoundment from future operations and will qualify under the small generator exclusion.

The operation of the sewer system and impoundment are such that any corrosive wastes which could have been discharged to them in

the past are immediately rendered non-corrosive by dilution and neutralization. We estimate that there have been few, if any, discharges of corrosive wastes to the sewer system and impoundment during the past 2 years. Due to an operational change in one of the plant's manufacturing areas, the only source of corrosive effluent (D002) will no longer be generated by the process nor subsequently transferred to the waste impoundment.

Ignitable (D003) and reactive (D003) chemicals and acrylonitrile (U009) are used in the plant as raw materials and were listed in the application to cover any possible spill clean-up operations which might occur at the plant. After reviewing the history of operations at Woodbridge, it has been determined that spills occur extremely infrequently and have been quite small in volume. During the last 2 years, no spills of these hazardous wastes have occurred. The hazardous wastes generated by future spill clean-up activities would qualify under the small quantity generator exclusion of Section 261.5 or would require filing for an emergency permit as outlined in Section 122.27.

Based on the facts outlined in 1, 2, and 3 above, and the circumstances regarding the limited use of the hazardous waste facilities to date, we now wish to withdraw our Part A Application for a Hazardous Waste Permit for the Woodbridge Plant and request that this application and the information contained within be deleted from the RCRA System. We fully recognize that in so doing we are surrendering our RCRA interim status for this plant location.

This submission or any past or future discussions or communication with respect to this matter is not intended to admit any liability or to waive any rights.

If you have any questions or wish to discuss this matter further, please contact me at telephone (201) 634-3800.

Very truly yours,

AMERICAN CYANAMID COMPANY

original signed by JD Berrian.

mailed from Hilton Head

J. D. Berrian
Plant Manager

JDB:h
njdo02L7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

18 APR 1983

Ms. Barbara Clark
American Cyanamid Company
1 Cyanamid Plaza, West Bldg.
Wayne, New Jersey 07470

Subject: American Cyanamid Co., Woodbridge Plant
EPA ID No. NJD002173151

RECEIVED

APR 21

B. S. CLARK

Dear Ms. Clark:

This will acknowledge that the subject facility has been declassified as a hazardous waste treatment, storage and/or disposal facility under the Resource Conservation and Recovery Act (RCRA). The change was made as a result of a letter dated November 13, 1981, from J.D. Berrian of American Cyanamid to Harry Ruisi of EPA, which detailed the reasons for your company's change in status.

I apologize for any inconvenience our delay in responding has caused your company. If you have any questions on this matter, please contact John Hajduk of my staff at (212) 264-9880.

Sincerely yours,

A handwritten signature in cursive script, reading "Richard A. Baker", is written over the typed name.

Richard A. Baker
Chief
Permits Administration Branch
Office of Policy & Management

Deletion - TSD
Facility reclassified to
DER on 12/24/83
DER LTR 12/24/83



Joe L. ...

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

Dr. Marwan M. Sadat
DIRECTOR

October 24, 1983

LINO F. PEREIRA
DEPUTY DIRECTOR

J. D. Berrian, Plant Engineer
American Cyanamid Company
Industrial Products Division
P.O. Box 8
Woodbridge, NJ 07095

RE: Hazardous Waste TSD Facility Classification and Permitting
Requirements for American Cyanamid Company, Woodbridge,
EPA ID NO. NJD002173151

Dear Mr. Berrian:

The Bureau of Hazardous Waste Engineering (the Bureau) acknowledges receipt of the copy of your letter addressed to Mr. Ruisi of the USEPA Region II, dated November 13, 1981 in which you requested reclassification to "generator only" status with both the EPA and the DEP due to modification or termination of several of the manufacturing operations.

The RCRA Part A application on record with the USEPA lists a hazardous waste storage in containers (S01) of 11,000 gallons, a hazardous waste treatment-other activity (T04) of 100 gallons per day and a hazardous waste storage in impoundment activity (S04) of 400,000 gallons.

The Bureau has reviewed the information provided in your letter, and has granted the requested S01 exclusion because your facility has terminated storage of hazardous waste containers since February 1981 as verified during site visit on July 26, 1983. The S01 has been delisted by the USEPA on April 18, 1983. Since the termination date of February 1981 for the S01 activity was before New Jersey Hazardous Waste Regulations became effective on October 1981, no formal closure plan approval is required.

With regard to T04 activity, the Bureau concludes, based on the information in your letter and your conversation of July 1983 with Bob Patel of my staff, that the activity is eligible for delisting from regulations as a TSD facility. The T04 referred to a drum washout station where legally empty formaldehyde drums were to be cleaned; therefore, no hazardous waste was being processed. The USEPA has also delisted the T04 activity on April 18, 1983.

New Jersey Is An Equal Opportunity Employer

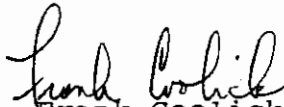
October 24, 1983

With regard to S04 activity, the Bureau understands that the USEPA delisted this activity from RCRA regulation on April 18, 1983. Storage in a surface impoundment constitutes an Industrial Waste Management Facility under New Jersey Hazardous Waste Regulations. As such, it is exempted from the regulatory requirements of N.J.A.C. 7:26-9.1 et seq. through N.J.A.C. 7:26-12.1 et seq. of the Division of Waste Management, and is instead under the jurisdiction of N.J.A.C. 7:14A-4.1 et seq. of the NJPDES regulations of the Division of Water Resources. Therefore, this Bureau is referring your correspondence regarding this S04 activity to the Division of Water Resources for their response.

However, the Bureau concludes that none of the three activities listed on the RCRA Part A application of the subject company are subject to regulation as hazardous waste TSD activities under N.J.A.C. 7:26-1 et seq., and hereby deleting the subject plant from listing as a hazardous waste facility subject to permitting requirements by the Division of Waste Management.

If you have any questions on these matters, please call my office at (609) 292-9880.

Very truly yours,



Frank Coolick, Chief

Bureau of Hazardous Waste Engineering

EP9/ch

c: [REDACTED]

USEPA, Region II

Paul Kurisko
NJDEP - DWR

John Trela
NJDEP - DWR

Dave Shotwell
NJDEP - DWR

Dr. Dave Leu
NJDEP - DWR



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 028, Trenton, N.J. 08625

MARWAN M. SADAT, P.E.
DIRECTOR

LINO F. PEREIRA, P.E.
DEPUTY DIRECTOR

19 DEC 1984

Mr. J. D. Berrian, Plant Manager
American Cyanamid Company
Industrial Products Division
P.O. Box 8
Woodbridge, NJ 07095

RE: Delisting as a Hazardous Waste Treatment, Storage or Disposal (TSD) Facility
of American Cyanamid Company, Woodbridge, EPA ID NO. NJD 002 173 151

Dear Mr. Berrian:

This letter follows up on your letter of November 13, 1981 addressed to Mr. Ruisi of the United States Environmental Protection Agency concerning the delisting of the lined surface impoundment storage of waste (S04) at the above referenced facility.

The original RCRA Part A application filed for the subject facility with the USEPA listed a hazardous waste storage in containers activity (S01) of 11,000 gallons, a hazardous waste treatment-other activity (T04) of 100 gallons per day and a hazardous waste storage in surface impoundment activity (S04) of 400,000 gallons.

The USEPA granted a delisting of the three activities under RCRA on April 18, 1983, and the NJDEP Bureau of Hazardous Waste Engineering granted delisting of S01 and T04 activities on October 24, 1983.

With regards to the S04 activity, the NJDEP Bureau of Hazardous Waste Classification and Manifest (BHWCM) reviewed your company's submittal of October 22, 1984 regarding the classification of lagoon effluent and replied to your company on November 15, 1984 that the waste was a nonhazardous liquid (ID #72) pursuant to the rules of the Division of Waste Management.

Therefore, as a result of your submittal of October 22, 1984 and the conclusion of the lagoon effluent classification as a bulk liquid (ID #72) by the BHWCM on November 15, 1984, the Bureau concludes that the S04 activity of your above referenced facility has been excluded from applicable hazardous waste TSD facility regulations under the New Jersey Division of Waste Management regulations (N.J. A.C. 7:26-1 et seq.).

New Jersey Is An Equal Opportunity Employer

233 Nov 81 NW
232 Nov 81 AR
Dec 19, 84 AR
S01 T04 S04
S01 T04 S04

Delisting
of S04

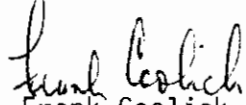
This written acknowledgement of the exclusion of the subject company from TSD facility requirements under N.J.A.C. 7:26-1 et seq. is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities occurring at the site mentioned above.

The issuance of this delisting letter by the Department does not indicate, or imply, and should not be construed as a waiver of any requirements pursuant to the New Jersey Pollution Control Act, N.J.S.A. 58:10A-1 et seq. and regulations promulgated thereunder concerning the New Jersey Pollutant Discharge Elimination System, N.J.A.C. 7:14A-1 et seq. If your facility is in any of the regulated categories identified in the above cited regulations, you are hereby directed to apply for any and all permits necessary within ninety (or 180 days - at the option of DWR) to the Bureau of Ground Water Discharge Permits, CN 029, Trenton, New Jersey, 08625. Applications may be obtained by calling (609) 292-0424.

Your company is no longer included on the NJDEP list of TSD facilities and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for TSD facilities. To operate a hazardous (TSD) facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

Should you have any questions on this matter, please contact Bob Patel of my staff at (609) 633-7713.

Very truly yours,



Frank Coolick, Chief
Bureau of Hazardous Waste Engineering

EP9/slw

c: Angel Chang, USEPA, Region II
Joseph Rogalski, NJDEP-DWM
Shirlee Schiffman, NJDEP-DWM
John Trela, NJDEP-DWR

MEMORANDUM
OF CALL

Previous editions obsolete

To:

☒ YOU WERE CALLED BY ☐ YOU WERE VISITED BY

Bastara Clark

OF (Organization) *American Cyanamid Co.
Woodbridge, N.J.*

☒ PLEASE PHONE ☐ FTS ☐ AUTOVON

201-831-3409

☐ WILL CALL AGAIN ☐ IS WAITING TO SEE YOU

☐ RETURNED YOUR CALL ☐ WISHES AN APPOINTMENT

MESSAGE

ack

NJ D002173151

*1 Cyanamid Plaza
West Bldg*

Wayne NJ 07470

RECEIVED BY	DATE	TIME
<i>HS</i>	<i>4/6</i>	<i>9:20</i>

63-110 NSN 7540-00-634-4018 STANDARD FORM 63 (Rev. 8-81)
Prescribed by GSA
FPMR (41 CFR) 101-11.6

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

7 2 APR 1983

Ms. Barbara Clark
American Cyanamid Company
1 Cyanamid Plaza, West Bldg.
Wayne, New Jersey 07470

Subject: American Cyanamid Co., Woodbridge Plant
EPA ID No. NJD002173151

Dear Ms. Clark:

This will acknowledge that the subject facility has been declassified as a hazardous waste treatment, storage and/or disposal facility under the Resource Conservation and Recovery Act (RCRA). The change was made as a result of a letter dated November 13, 1981, from J.D. Berrian of American Cyanamid to Harry Ruist of EPA, which detailed the reasons for your company's change in status.

I apologize for any inconvenience our delay in responding has caused your company. If you have any questions on this matter, please contact John Hajduk of my staff at (212) 264-9880.

Sincerely yours,

Richard A. Baker
Chief
Permits Administration Branch
Office of Policy & Management

2PM:PA:Hajduk:JA:4/14/83			CONCURRENCES				
SYMBOL	2PM:PA	2PM:PA	2PM:PA				
SURNAME	Hajduk	Zambratto	Baker				
DATE	4/15/83	4/15/83	4/15/83				

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY



AMERICAN CYANAMID COMPANY
Industrial Products Division
P. O Box 8
Woodbridge, NJ 07095
(201) 634-3800

November 13, 1981

file
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

EPA Region II
Information Service Plaza
26 Federal Plaza
New York, N. Y. 10007

RE: NJD002173151

Dear Mr. Ruisi:

We herewith request cancellation of the above referenced RCRA interim status (Part A) application.

On November 14, 1980, American Cyanamid Company's Woodbridge Plant (EPA I.D. Number NJD002173151) submitted a Part A, Application for Hazardous Waste Permit to your office in accordance with the EPA's Consolidated Permits Program regulations.

This permit application specifically listed the following as the hazardous waste storage and treatment operations at Woodbridge:

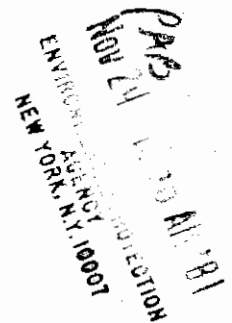
Storage

S01	Containers	11,000 gallons
S04	Surface Impoundment	400,000 gallons

Treatment

T04	Other	100 gallons per day
T04	Other	(Included with S04 above.)

Several of the manufacturing operations at the Woodbridge Plant have either permanently ceased or have been modified since our previous November, 1980 application submittal, thus making Woodbridge's status as a Part A Hazardous Waste Facility no longer appropriate. Since last November, the following changes have taken place at the plant:



1) The storage in containers (S01) of contaminated drum liners from the manufacture of vanadium pentoxide catalyst no longer occurs. Production of vanadium pentoxide catalyst at Woodbridge was terminated in February, 1981. Also, a non-hazardous determination for vanadium pentoxide catalyst was postulated by The Fertilizer Institute (McKenna, Conner and Cuneo Law Offices report to Mr. K. T. Johnson, The Fertilizer Institute, June 22, 1981) with which the EPA has concurred. The catalyst was determined to be non-hazardous because: (a) the waste is not pure or off-specification vanadium pentoxide and should not be designated as P120, (b) spent catalyst is not a listed hazardous waste (Sections 261.31 to 261.33), and (c) the catalyst does not have any of the four hazardous waste characteristics (Sections 261.21 to 261.24).

Therefore, since 1) vanadium pentoxide catalyst has received a non-hazardous classification and 2) the Woodbridge Plant no longer produces this material, the Part A RCRA application no longer applies to this operation.

2) The operation listed as 'other treatment' (T04) on the Woodbridge application pertained to a drum washout station where empty formaldehyde (U122) drums were to be cleaned. The production of formaldehyde-containing products at Woodbridge is such that at a maximum only two empty formaldehyde drums per year will be washed out at this station. The hazardous wastes generated by this operation would, therefore, qualify under the small quantity generator exclusion, Section 261.5 of the RCRA regulations. Again, the Part A RCRA status is not necessary for this minimal waste generation. To date no formaldehyde drums have been washed out.

3) The surface impoundment storage (S04) and associated other treatment (T04) noted in our application refers to the on-site 400,000 gallon impoundment is used for effluent equalization and pH adjustment prior to final treatment of the waste at the Woodbridge Township Publically Owned Treatment Works (POTW). Our Part A application listed formaldehyde (U122) from the drum washout station, and ignitable (D001), corrosive (D002), reactive (D003), and acrylonitrile (U009) wastes from spill clean-up as the hazardous waste constituents which could enter the surface impoundment.

As noted in No. 2 above, a minimal amount of formaldehyde from drum washout (e.g. two drums per year at a maximum) will enter the surface impoundment from future operations and will qualify under the small generator exclusion.

The operation of the sewer system and impoundment are such that any corrosive wastes which could have been discharged to them in

the past are immediately rendered non-corrosive by dilution and neutralization. We estimate that there have been few, if any, discharges of corrosive wastes to the sewer system and impoundment during the past 2 years. Due to an operational change in one of the plant's manufacturing areas, the only source of corrosive effluent (D002) will no longer be generated by the process nor subsequently transferred to the waste impoundment.

Ignitable (D009) and reactive (D003) chemicals and acrylonitrile (U009) are used in the plant as raw materials and were listed in the application to cover any possible spill clean-up operations which might occur at the plant. After reviewing the history of operations at Woodbridge, it has been determined that spills occur extremely infrequently and have been quite small in volume. During the last 2 years, no spills of these hazardous wastes have occurred. The hazardous wastes generated by future spill clean-up activities would qualify under the small quantity generator exclusion of Section 261.5 or would require filing for an emergency permit as outlined in Section 122.27.

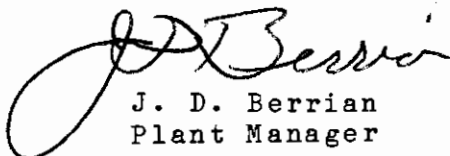
Based on the facts outlined in 1, 2, and 3 above, and the circumstances regarding the limited use of the hazardous waste facilities to date, we now wish to withdraw our Part A Application for a Hazardous Waste Permit for the Woodbridge Plant and request that this application and the information contained within be deleted from the RCRA System. We fully recognize that in so doing we are surrendering our RCRA interim status for this plant location.

This submission or any past or future discussions or communication with respect to this matter is not intended to admit any liability or to waive any rights.

If you have any questions or wish to discuss this matter further, please contact me at telephone (201) 634-3800.

Very truly yours,

AMERICAN CYANAMID COMPANY



J. D. Berrian
Plant Manager

JDB:h
njdo02L7

RCRA GENERATOR INSPECTION FORM

JUN 17 8 18 AM '81
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

COMPANY NAME: American Cyanamid

EPA I.D. NUMBER: NY D002173151

COMPANY ADDRESS: Woodbridge NJ

COMPANY CONTACT OR OFFICIAL: John D Berrian

INSPECTOR'S NAME: Charles Elmendorf

TITLE:

BRANCH/ORGANIZATION: NJDEP / Bureau
Hazardous Waste

CHECK IF FACILITY IS ALSO A TSD
FACILITY ☒

DATE OF INSPECTION:

YES NO DON'T
KNOW

(1) Is there reason to believe that the facility has hazardous waste on site? X

a. If yes, what leads you to believe it is hazardous waste?
Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

YES NO DON'T
KNOW

- b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

1. = X

Please explain: There is an 'old disposal area' on site, but

Mr Zerrian admitted that although he doesn't know what was disposed of here, it could be hazardous.

- c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

Vanadium pentoxide V_2O_5 stored in fibre drums on site.

The fines, or unusable powder of this material is the major waste.

- d. Describe the activities that result in the generation of hazardous waste.

production of V_2O_5 used in the manufacturing of
~~Sulfuric acid~~

- (2) Is hazardous waste stored on site?

X

- a. What is the longest period that it has been accumulated?

2 yrs

- b. Is the date when drums were placed in storage marked on each drum?

a

- (3) Has hazardous waste been shipped from this facility since November 19, 1980?

X

- a. If "yes," approximately how many shipments were made?

- (4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980?

- a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?

N/A

NO shipments made

- b. If "no" or "don't know," please elaborate.

YES	NO	DON'T KNOW
-----	----	---------------

c. Does each manifest (or a representative sample) have the following information?

- a manifest document number
- the generator's name, mailing address, telephone number, and EPA identification number
- the name, and EPA identification number of each transporter
- the name, address and EPA identification number of the designated facility and an alternate facility, if any:
- a description of the wastes (DOT)
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA

(5) Were there any hazardous wastes stored on site at the time of the inspection?

a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?

b. If not properly packaged or in secure tanks, please explain.

Besides the 'old disposal site' which is oozing a thick black substance, all storage is proper.

c. Are containers clearly marked and labelled?

d. Do any containers appear to be leaking?

e. If "yes," approximately how many?

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year? N/A

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?

N/A No wastes

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

shipped recently

(8) General comments.

The only real problem noted this inspection is the 'former disposal site' on site. A thick black material was seen oozing from the ground. The Company Contact did not know how big the area was or exactly what was in it, although he seemed to think that a good chance exists that some of the material is hazardous.

* The effective date for this requirement is March 1, 1982.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA TSD FACILITY INSPECTION CHECKLIST

Company's Name: American Cyanamid

EPA I.D. #: NSD002173151

Company's Address: Woodbridge NJ-

Contact: John D. Derrian

YES

NO

1. Does the facility have an EPA I.D. number?

(X)

()

2. In what capacity does the facility handle hazardous waste? Circle all appropriate

()

()

Storer

Treater

Disposer

Pile

Drums

Surface Tanks

Subsurface Tanks

Surface Impoundments

Other Abandoned chemical dump on site

Filtration

Incineration

Thermal

Chemical

Biological

Other adjust pH in the case of a spill

Landfill

Land Treatment

Incineration

Surface Impoundment

Other

3. Does the facility generate hazardous waste?

(X)

()

4. Does the facility transport hazardous waste?

()

(X)

5. Does the facility comply with the following

()

()

a. Adequate Security

(X)

()

Comments:

b. Contingency Plan and Emergency Procedures

(X)

()

Comments:

c. Inspection Plan

(X)

()

Comments:

d. Personnel Training

()

(X)

Comments:

not adequate

No written personnel training program

was noted

e. Waste Analysis Plan

Comments:

V_2O_5 fines (powder) is only
waste on site, this is product
but unusable in powder form - sold in pellets.

f. Preparedness and Prevention Plans

Comments:

No formal plans were noted.

6. Has the facility filed a part a permit application?

(X) ()

7. Does the facility maintain manifest records?

() (X)

8. Does the facility have other environmental permits?

(X) ()

a. NPDES

() (X)

b. Air

(X) ()

c. State

--identify

() (X)

d. Other

--identify

() (X)

9. Identify hazardous wastes handled and method for handling

V_2O_5 stored on site in fibre-drum.

10. General Comments

Facility looked ok, but a "former disposal site" oozing a black tar-like material from the ground was noted. A sample of the material will be secured by DEP personnel.

Inspected by: R. Elmendorf

Date: 4-10-81

* RCRIS: Notification View Screen 2 of 6 *

*EPA Id: NJD002173151 Other Id: Merge Send: Y *
*Date Received(MMDDYY): 081880 Source(N/E/S): N Non-Notifier Flag: *
*Date Acknowledged (MMDDYYYY): 10091980 Send Acknowledgement: *
*Name of Installation: AMERICAN CYANIMID CO *
* Installation Location Address *
*Streets: CUTTERS DOCK RD *
*City: WOODBRIDGE State: NJ Zip: 07095 *
*County Code: 023 County Name: MIDDLESEX *
* Installation Mailing Address *
*Streets: P O BOX 8 *
*City: WOODBRIDGE State: NJ Zip: 07095 *
* Contact Information *
* Last Name First Name Title Phone Address(M,L,O) *
* BERRIAN JON PLANT MANAGER 2016343800 L *
*Streets: CUTTERS DOCK RD *
*City: WOODBRIDGE State: NJ Zip: 07095 *
*Land Type: *

* Enter-Continue F1-Previous Screen F3-Exit *

* RCRIS: Notification View Screen 3 of 6 *

* EPA Id: NJD002173151 Other Id: Source: N *
* Owner Sequence Number: 1 *
* Ownership: AMERICAN CYANMID COMPANY Type of Owner: P *
* Address of Owner/Operator *
* Street: BERDAN AVENUE *
* City: WAYNE State: NJ Zip Code 07470 *
* Phone: 2016312000 *
* Current/Previous Indicator: CO Change Date(MMDDYY): *

* Enter-Continue F1-Previous Screen F3-Exit F5-Curr. Owner *
* F6-Prev. Owner F8-Help F9-First F10-Next *

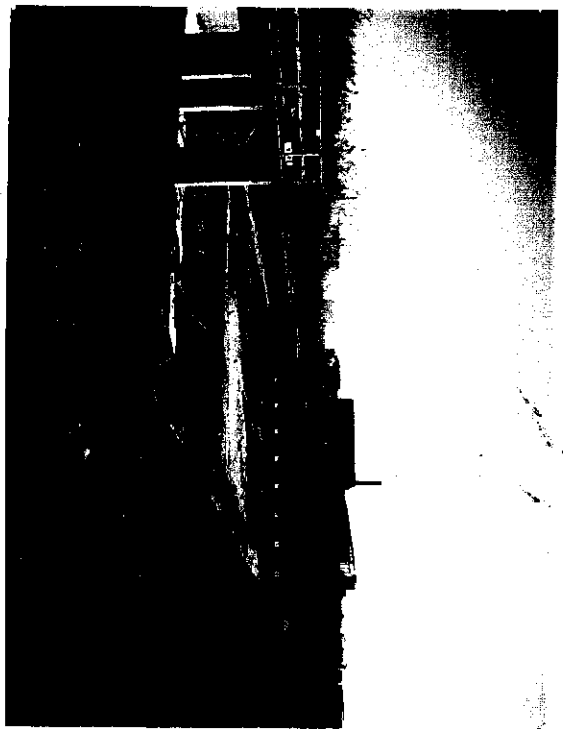
RCRIS: Notification View Screen 4A of 6
EPA ID: NJD002173151 Other ID: Source: N
Waste Type RCRA Reg Status Desc State Reg Status Desc
HM Generator 1 R
HM TSD
HM Transporter
Mode of
Transportation: Air Highway Water Other
HM Burner/Blender
NMH Used Oil Recycler
Underground Injection Control:
Recycler:
* Enter-Continue F1-Previous Screen F3-Exit F8-Help

RCRIS: Notification View Screen 5 of 6
EPA ID: NJD002173151 Other ID: Source: N
Hazardous Waste Codes: Specific/Non-Specific/Commercial/Chemical
D000 D001 D002 D003 P120
U009 U122

F1-Previous Screen F3-Exit F8-Help
F9-First F10-Next

Enter-Continue





American Cyanamid Co.

Woodbridge Plant

Surface Impoundment/Neutralization

S04/T04

(Impermeable liner shown -
Basin Empty)

POLACOLOR 2 H013311

Facility: American Cyanamid		Loc: Middletown		SIC:		
ID: NJ D002173161		Insp Date: 7/26/93		Revw Date: 10/8/93		
Fac Person: Jon Bernier		Region: Central		Revw: K. Lew		
Title: Plant Manager		Insp: William Kaiser		Notif Date:		
Tele: 908-634-3800		Insp Type: CEI		Start File NOV 2007		
Site Gen Trans TSD		State Act:		Initiate:		
Recv TSD:		Refer:		On Prog:		
Vol/Mo:		Trans Units:		Comm Date:		
GW Wells:		Stor Units:		S Info:		
Permits:		Waste Codes:				
Operation: Manufactures polymer based resins used by water treatment and well drilling industries				Insp Comm (date, re, outcome):		
Process:						
C110 - acrylonitrile - vessel cleaning						
X726 - Hager Lab						
MW Gen:						
C110 P003 (pest solvent)						
X726 (waste oil) X850 (lab pad)						
Waste Codes:				Doc Req:		
TSD:				Fac Comm (date, re, outcome):		
MW De: Knowl: TCA: TCLP:						
Manifest: 2 Out Code: LDR: Stor:						
Manifest Date Code Del						
				Doc Req:		
				TSD Comm (date, re, outcome):		
Fac Notes:						
- Manifest Violation (No document + satellite storage)				Doc Req:		
- OTT personnel				NOV 2007 Other		
- local authority agreements				On:		
Comp. Sched: Achieved: 0				Notes:		
Site by epi. rep:				NO LDR Violations		
Comp. Hist:						
Date Viol Class Act						
- Working Plan, lack info on local authority agreements						
- Emergency Coord not listed						
- Emergency eqpt. location						
Rep Docs:				File Docs:		
EPA Action	Date Issued	Due Date	Exemption Req	New Date	Date Rec'd	Stat/Comments
1						

FACILITY FILE NUMBER: 12-25-18

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY
DIVISION OF FACILITY WIDE ENFORCEMENT
CENTRAL FIELD OFFICE

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: American Cyanamid

EPA ID NUMBER: NJD002173151

ADDRESS: 35 Cutters Dock Rd.

MUNICIPALITY: Woodbridge

COUNTY: Middlesex

BLOCK: _____ LOT: _____

PHONE: (908)634-3800 FAX: (908) 634-8326

PARTICIPATING PERSONNEL

FACILITY PERSONNEL: Jon Berrian, Plant Manager

INSPECTION DATE: July 26, 1993

INSPECTOR'S NAME: William Kaiser

INSPECTOR'S AGENCY: DEPE BUREAU: Central Enforcement

REPORT PREPARED BY: William Kaiser, Senior Environmental Specialist

TELEPHONE: (609) 584-4200

REVIEWED BY: Doug Greenfield

DATE OF REVIEW: 7-28-93

PHOTOS TAKEN () YES (X) NO IF YES, HOW MANY?

SAMPLE TAKEN () YES (X) NO # OF SAMPLES

NJDEPE SAMPLE ID# :

SITE BACKGROUND INFORMATION

EMPLOYEES: 23

SIC CODE: 2821

DATE OPERATIONS BEGUN: 1913

8 HR SHIFTS/WEEK: 15

ACRES: 6.5

BUILDINGS/SQ.FT: 11 / 80,000

PRODUCTS PRODUCED: Polymers used in water treatment and oil field drilling.

PREVIOUS OPERATIONS AT SITE: Chemical company.

WATER SUPPLY: city water and well water (only for processes)

MONITORING WELLS (explain): 5 for NJPDES groundwater permit

SANITARY DISPOSAL: Connected to public sewer.

FLOOR DRAINS: Those that are present are connected to the facility's lagoon that discharges to MCUA.

AIR PERMITS: See attached list

NJPDES PERMITS: #0001295

PERMITS - OTHER: MCUA #28091

TANKS ON SITE (non hazardous waste): Numerous bulk liquid tanks are on site for product and intermediate ingredient storage.

COMMENTS:

INSPECTION & GENERAL FACILITY DESCRIPTION & OPERATIONS

On July 26, 1993 this writer of the New Jersey Department of Environmental Protection and Energy (NJDEPE) arrived at the above referenced facility located in Woodbridge, NJ to conduct a RCRA compliance evaluation inspection. Upon arrival I met Mr. Jon Berrian, the plant manager. After explaining the purpose and objectives of my inspection and receiving basic information about the facility, Mr. Berrian provided me with a tour of the plant and a description of operations.

At this location, American Cyanamid manufactures polymer based resins used by the water treatment and well drilling industries. The manufacturing process consists of combining acrylonitrile, a catalyst, and water in a large mixing vessel to make a slurry. The slurry is then mixed with sodium hydroxide. Ammonia is given off by the reaction and burned in an on site permitted incinerator. The resulting liquid resin is then collected. The resin is then placed in a process where it is extruded through two steam heated cylinders. The resulting dry sheet of resin is then ground up and sold in a powdered form.

Our tour began at the process vessels where the water, acrylonitrile, and catalyst are mixed together. The only wastes generated by this process result from cleaning of the vessels. Material that clings to the side and bottom of the vessels must be removed every four to six months. The material removed has been tested and found to contain acrylonitrile in quantities of approximately 50 ppm. As a result, the material is shipped off site as a C110 hazardous waste.

The tour then led to the roof where we observed the incinerator whose purpose is to combust ammonia vapors from the reaction of the acrylonitrile and catalyst.

We then toured the drying area where the resin is drawn out into thin sheets and then broken down into a powdered form. No wastes result from this process.

Building 2 was then inspected. This location is where waste oil is stored. The oil results from changing lubricants in gear boxes of various machines on site. There were two drums on site, one was nearly full and one was approximately half full. Mr Berrian said they are managed as a X726 waste oil.

We then toured a carbon processing area. Here, powdered carbon is mixed with water and a resin. The resulting mixture is extruded into worm-like pellets approximately 3 inches long. The pellets are then heated in an oven and passed through a calciner which produces pore space in the pellets as required by the customer. No wastes are generated in the process.

A tour of the maintenance shop found 1 thirty gallon Safety-Kleen parts washer. Oily rags are also collected here and placed in a 55 gallon drum that is removed by Safety-Kleen.

We then toured building 17 which is used exclusively for product storage.

After building 17, we went to the south end of the property to view the facility's NJPDES permitted lagoon. Waste water from plant operations is piped to the lagoon where it is aerated. It is then pumped to the municipal sewer system under a permit and sent to MCUA.

A tour of building 18 found that it was used exclusively for product and outdated product storage. Any material that can not be used either on site or at another facility is shipped off as a solid waste for incineration.

The tour then continued at the sample room. Here, numerous chemicals are placed in 2 ounce bottles for salesman to take to customers. No wastes were present.

A room adjacent to the sample room is used for storage of expired chemicals. There were 4 safety-cabinets present. Three are used to store various flammable chemicals while one is devoted to corrosives. The three flammable cabinets are primarily for the storage of out dated or expired chemicals. Containers stored in the cabinets held volumes of one to 5 gallons. At present the cabinets were managed as satellite containers but were without "hazardous waste" markings. Together we discussed the requirements of satellite generation. The method of accumulation at present was of concern since it does not meet the strict definition of a satellite container. It more closely follows <90 day accumulation which requires each container to be marked with the words "hazardous waste" and an accumulation start date. Satellite generation could be used if all spent chemicals were added to a 55 gallon drum, assuming they were all compatible (this is consistent with the new satellite proposal regulations that require waste be stored in a single container). The only deficiency cited was failing to label a satellite with the words "hazardous waste". Violations for failing to label the containers with the words "hazardous waste" and failing to mark them with an accumulation start date could have been cited as required by <90 day accumulation requirements but were not since the facility was employing satellite generation, albeit incorrectly. Mr. Berrian was informed that the method of storage must be in accord with <90 day accumulation requirements if the safety cabinets continue to be used for storage of waste.

We then toured the lab where various QA tests are performed. One 5 gallon safety can is used for the storage of spent solvents. It was found to be properly marked with the words "hazardous waste". No other wastes were present.

This concluded the tour of the facility. We then returned to Mr. Berrian's office where I reviewed the facility's manifests, contingency plan, training program, and preparedness and prevention documentation.

32 manifests were reviewed since January of 1991. Minor violations were discovered on four manifests that were missing a manifest document number.

A review of the contingency plan found minor violations. See the Summary of Violations section of this report for specific deficiencies.

A review of training records found that the company did not have an active training program regarding hazardous waste. A violation was therefore issued.

A review of preparedness and prevention documentation also uncovered minor violations. Refer to the Summary of Violations section of this report for specific deficiencies.

This concluded the inspection. A briefing was then conducted with Mr. Berrian. Together we discussed the issued violations and options for corrective action. I provided Mr. Berrian with a copy of a boiler plate contingency plan and copy of the "Generator" Hazardous Waste Quarterly. Mr. Berrian was informed that a letter of response outlining the steps taken to achieve compliance must be submitted within 15 days and that a followup inspection would take place in the near future to determine if corrective action has been completed.

HAZARDOUS WASTE GENERATION

American Cyanamid generates six waste streams on a continual basis. The first consists of waste oil that is generated from draining gearboxes of machinery. The oil is coded as X726 and shipped to Safety-Kleen.

The second waste stream consists of spent laboratory solvents that are collected in a 5 gallon safety can managed as a satellite accumulation vessel. The waste is shipped as a F003 to Chemical Waste Management.

The third waste stream consists of outdated chemicals that are lab packed and shipped off site via AETC. The waste is shipped using the X850 code for lab packed chemicals.

The fourth waste stream consists of cleanout of the mixing vessels. The waste is removed 2-3 times per year and is shipped as a C110 waste.

The fifth waste stream consists of Safety-Kleen solvent generated in a 30 gallon parts washer located in the maintenance shop.

The sixth waste stream consists of oily rags generated in the maintenance shop. The rags are collected in a 55 gallon drum and collected by Safety-Kleen.

SUMMARY OF WASTE STORAGE

<u>AREA</u>	<u># DRUMS</u>	<u>CONTENTS</u>
Building #2	2	waste oil
lab	1 - 5 gal. safety can	spent solvents
storage room	numerous 1 & 5 gal. containers	expired chemicals
Maintenance shop	1 - 30 gal. parts washer	Safety-Kleen solvent

MANIFEST DEFICIENCIES

<u>MANIFEST NUMBER</u>	<u>DEFICIENCY</u>
1241663 (12/6/91)	NO MANIFEST DOCUMENT NUMBER
1388235 (5/11/92)	"
1240033 (2/28/92)	"
1559280 (3/8/93)	"

SUMMARY OF VIOLATIONS

- 7.4(a)4viii American Cyanamid failed to list any special handling instructions on the manifest. Specifically, 4 manifests were without a manifest document number.
- 9.3(d)4 American Cyanamid failed to mark each container of hazardous waste stored in a satellite storage area with the words "Hazardous Waste". Specifically, * in violation of N.J.A.C. 7:26-.
- 9.4(g) American Cyanamid failed to provide the required classroom or on-the-job training for facility personnel. Specifically:
- *. American Cyanamid failed to ensure that this program includes all the elements described in the document required under N.J.A.C. 7:26-9.4(g)6iii, in violation of N.J.A.C. 7:26-9.4(g)1.
 - *. American Cyanamid failed to have a program which is directed by a person trained in hazardous waste management procedures, in violation of N.J.A.C. 7:26-9.4(g)2.
 - *. American Cyanamid failed to have a program designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, in violation of N.J.A.C. 7:26-9.4(g)3.
 - *. American Cyanamid facility personnel failed to successfully complete the program required in N.J.A.C. 7:26-9.4(g)1-3 within six (6) months after the effective date of this subchapter or within six (6) months after the date of their employment or assignment to a facility, or to a new position at a facility, in violation of N.J.A.C. 7:26-9.4(g)4.
 - *. American Cyanamid facility personnel failed to take part in an annual review of the initial training required in N.J.A.C. 7:26-9.4(g)1-3, in violation of N.J.A.C. 7:26-9.4(g)5.
 - *. American Cyanamid failed to maintain the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job, in violation of N.J.A.C. 7:26-9.4(g)6i.
 - *. American Cyanamid failed to maintain a written job description for each position listed under N.J.A.C. 7:26-9.4(g)6i, to keep this current and consistent in its degree of specificity with descriptions of other similar positions in the same company location or bargaining unit, including the requisite skill, education, or other qualifications, and duties of employees assigned to each position, in violation of N.J.A.C. 7:26-9.4(g)6ii.
 - *. American Cyanamid failed to maintain a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under

N.J.A.C. 7:26-9.4(g)6i, in violation of N.J.A.C. 7:26-9.4(g)6iii.

- *. American Cyanamid failed to maintain records that document that the training or job experiences required under N.J.A.C. 7:26-9.4(g)1 through 5 has been given to, and completed by, facility personnel, in violation of N.J.A.C. 7:26-9.4(g)6iv.
 - *. American Cyanamid failed to keep training records on current personnel until closure of the facility and training records on former employees for at least three (3) years from the date the employee last worked at the facility, in violation of N.J.A.C. 7:26-9.4(g)7.
 - *. American Cyanamid failed to conduct semi-annual drills involving all employees and appropriate local authorities in order to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to N.J.A.C. 7:26-9.7, in violation of N.J.A.C. 7:26-9.4(g)8.
- 9.6(f) American Cyanamid failed to make the required arrangements with police or fire departments, emergency response contractors, equipment suppliers, or local hospitals, or to document any such authority's refusal of such arrangements. Specifically:
- *. American Cyanamid failed to make arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes, in violation of N.J.A.C. 7:26-9.6(f)1.
 - *. American Cyanamid failed to make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility, in violation of N.J.A.C. 7:26-9.6(f)4.
 - *. American Cyanamid failed to make arrangements to have the local fire department inspect the facility on a regular basis with at least two (2) inspections annually, in violation of N.J.A.C. 7:26-9.6(f)5.
- 9.7(e) American Cyanamid, in it's contingency plan, failed to describe the arrangements agreed to by local police or fire departments, hospitals, contractors, or State or local emergency response teams.
- 9.7(f) American Cyanamid, in it's contingency plan, failed to list the name, addresses or phone numbers of persons qualified to act as emergency coordinator.
- 9.7(g) American Cyanamid, in it's contingency plan, failed to list emergency equipment, updated as required, with its location, description, or capabilities specified.

WASTE MINIMIZATION

American Cyanamid produces a product that requires specific processes and ingredients. As a result, the company is not able to reduce wastes to a great degree. Solvents from the lab are used in measured quantity to reduce the amount requiring disposal.

Out dated chemicals are stored while alternate uses are investigated. Many times the materials can be used at an alternate facility or can be sold to a client. Only if another use cannot be found will a material be discarded as a waste.

GENERATOR INDEX

CHECK THE SECTIONS AND ACTIVITIES OF THIS REPORT WHICH ARE APPLICABLE TO THE FACILITY AND COMPLETE THOSE SECTIONS FOR THIS INSPECTION.

GENERATOR WASTE MANAGEMENT PRACTICES

<u>#</u>	<u>SECTION</u>	<u>PAGE</u>
1.	WASTE DETERMINATION	7. <u>✓</u>
2.	GENERATOR STATUS	8. <u>✓</u>
3.	SATELLITE STORAGE AREAS	9. <u>✓</u>
4.	< 90 DAY CONTAINER STORAGE AREAS	10. <u> </u>
5.	WASTE OIL USAGE	11. <u>✓</u>
6.	< 90 DAY ABOVE GROUND TANKS STORAGE AREAS	12. <u> </u>
7.	WASTE MANAGEMENT PRACTICES	13. <u>✓</u>
8.	GENERATOR MANIFESTS	14. <u>✓</u>
9.	EXPORTING HAZARDOUS WASTE	16. <u> </u>
10.	CONTINGENCY PLAN & EMERGENCY PROCEDURES	17. <u>✓</u>
11.	PERSONNEL TRAINING	19. <u>✓</u>
12.	PREPAREDNESS & PREVENTION	21. <u>✓</u>
13.	"WASTE WATER TREATMENT UNIT" QUALIFICATION	23. <u> </u>

SECTION 1.

WASTE DETERMINATION:

YES NO

DOES the facility generate "solid waste". ✓

DOES the facility generate a "hazardous waste". /

IS THE FACILITY CORRECTLY CLASSIFYING ITS WASTES? ✓ _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

8.5(a) Generator failed to determine
if its "solid waste" is hazardous? _____

7.4(x) Generator FAILED to properly classify its waste according to the "Hierarchy". _____

COMMENTS

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SECTION 2.

GENERATOR STATUS

YES NO

Does the generator generate/accumulate >100 kg of hazardous waste (1kg acutely) or greater than 1001 gal of listed waste oil in any calender month?
(except x725 - 100 kg rule applies)

IF YES,

7.4(a)1 Does the Generator have an EPA ID number.

IF THE GENERATOR IS A SQG.,

Does the generator wish to deactivate his EPA ID. number?

COMMENTS

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

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SECTION 3.SATELLITE ACCUMULATION AREAS

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE SATELLITE ACCUMULATION REGULATIONS?	<u>✓</u>	<u> </u>
IF NO, CHECK THE ITEMS OF NON COMPLIANCE.		
9.3(d)1 Quantity of waste <u>EXCEEDS</u> 55 gal.or 1 qt. of acutely hazardous waste.		<u> </u>
9.3(d)2 Containers <u>FAIL</u> to:		
Meet the standards of 7.2 (Container Requirements).		<u> </u>
Poor or leaking container.		<u> </u>
Container made of incompatible material.		<u> </u>
Container not kept securely closed.		<u> </u>
9.3(d)3 Accumulation area is:		
<u>NOT</u> at or near a point of generation.		<u> </u>
<u>NOT</u> under the control of the operator.		<u> </u>
9.3(d)4 Containers are <u>NOT</u> marked "Hazardous waste".		<u> </u> <u>✓</u>
9.3(d)5 Containers <u>NOT</u> marked with date when filled.		<u> </u>
9.3(d)6 Containers were <u>NOT</u> moved from satellite area within three days.		<u> </u>

COMMENTS

These containers (cabinets) managed during the inspection as satellites will be ~~correctly~~ managed instead as < 90 day storage areas for assorted chemicals destined for lab packs.

SECTION 4.GENERATOR CONTAINER STORAGE AREAS

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE
GENERATOR STORAGE REGULATIONS?

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

7.2(a)	<u>NO</u> manifest number on containers ready for disposal.	_____
7.2(b)	Containers <u>FAILED</u> to meet DOT regulations. (49 CFR 171,179)	_____
9.3(a)1	Waste <u>ACCUMULATED</u> OVER 90 DAYS.	_____
9.3(a)3	Containers <u>NOT</u> marked with accumulation start date or "Hazardous Waste".	_____
9.4(d)1i	Containers <u>NOT</u> of adequate construction.	_____
9.4(d)1ii	Closures <u>NOT</u> of sufficient strength.	_____
9.4(d)2	Containers <u>NOT</u> in good condition.	_____
9.4(d)3	Containers <u>NOT</u> compatible with waste.	_____
9.4(d)4i	Containers <u>NOT</u> kept closed.	_____
9.4(d)4iii	Containers <u>NOT</u> properly handled.	_____
9.4(d)4iv	Hazardous wastes <u>NOT</u> segregated.	_____
9.4(d)4v	ID Labels <u>NOT</u> visible.	_____
9.4(d)5	Accumulation area <u>NOT</u> inspected daily.	_____
9.4(d)6	Containers of ignitable and reactive wastes are <u>NOT</u> located at least 50 feet from the facility's property line.	_____
9.6(d)	Access to communication or alarm system is <u>NOT</u> maintained.	_____
9.6(e)	<u>INADEQUATE</u> aisle space.	_____

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SECTION 5

WASTE OIL

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE
WASTE OIL STORAGE REGULATIONS?

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

The generator ONLY generates or accumulates less than 1001 gals. of waste oil per month and:

- 7.7(d) Generator FAILED to obtain receipts and retain them for three years.

- 9.2(b) If under ground tanks are used to store waste oil, the generator is NOT a:

1. New commercial service station waste oil tanks of <1001 gal capacity*

or does NOT:

2. Use underground tanks in existence and in use for Hazardous Waste storage prior to 1/17/83.

NOTE: If the generator accumulates over 100 kg of hazardous waste and <1001 gal of waste oil, he must manifest off the waste oil but does not have to comply with subchapter 9 requirements for waste oil. If the generator accumulates >1001 gal of waste oil in any given month he MUST be in compliance with ALL generator requirements.

COMMENTS:

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SECTION 6.

ABOVE GROUND TANKS

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE ABOVE GROUND <90 DAY STORAGE TANK REGULATIONS?	_____	_____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

If the generator stores hazardous waste in an above ground tank for <90 days, the generator FAILED to:

- | | | |
|---------|---|-------|
| 9.3(b) | Have a letter of approval? | _____ |
| 9.3(b)2 | Have overfilling controls? | _____ |
| 9.3(b)3 | Have secondary containment? | _____ |
| 9.3(b)4 | Insure that 99% of the tank can be emptied? | _____ |
| 9.3(b)5 | Empty the tank every 90 days? | _____ |
| 9.3(b)6 | All wastes removed from the tank(s) to authorized facility? | _____ |
| 9.3(b)8 | If part of the tank is below grade, all of the tank cannot be visually inspected. | _____ |
| 9.3(b)9 | The tank is <u>not</u> labeled with the words "HAZARDOUS WASTE". | _____ |

COMMENTS

SECTION 7.

WASTE MANAGEMENT

	YES	NO
IS THE FACILITY IN COMPLIANCE WITH THE WASTE MANAGEMENT REGULATIONS?	<u>✓</u>	<u> </u>

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

- | | | |
|-------------------------|--|-------------------|
| 12.1(a) | Generator <u>IS ACTING</u> as a TSDF by: | |
| | 1. Treating hazardous waste. | <u> </u> |
| | 2. Storing hazardous waste. | <u> </u> |
| | 3. Disposing of hazardous waste on site? | <u> </u> |
| 9.3(a) 1 | The generator FAILS to ship hazardous waste off site within 90 days. | <u> </u> |
| 9.2(a) 2 | Hazardous waste <u>IS</u> handled in a manner which causes or may cause a spill. | <u> </u> |
| N.J.S.A. 58:10-23.11(c) | | |
| | Discharge of a hazardous substance. | <u> </u> |
| N.J.S.A. 58:10-23.11(e) | | |
| | Failure to report the discharge. | <u> </u> |

IF THE FACILITY IS ACTING AS A TSDF, COMPLETE THE TSD REPORT.

COMMENTS:

SECTION 8.GENERATOR MANIFESTS

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE GENERATOR
MANIFEST REGULATIONS?____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE

7.4(a)3	Generator <u>FAILED</u> to prepare a Hazardous Waste Manifest.	_____
7.4(a)4	Each manifest <u>failed</u> to have the following information:	
7.4(a)4i	Generator's name, mailing address (site address if different), and phone number.	_____
7.4(a)4ii	The generator's EPA ID number.	_____
7.4(a)4iii	The transporter(s) name, phone number, NJ registration and decal numbers.	_____
7.4(a)4iv	The transporter(s) EPA ID number.	_____
7.4(a)4v	The name, address and phone number of the designated TSD facility.	_____
7.4(a)4vi	The TSDF's EPA ID number.	_____
7.4(a)4vii	The proper USDOT description.	_____
OR		
	Complete NOS information in item J.	_____
7.4(a)4viii	Special handling instructions.	_____ <u>✓</u>
7.4(a)5i	The generator signature.	_____
7.4(a)5ii	Transporter's signature & date.	_____
7.4(a)5iii	Generator <u>FAILED</u> to retain copy and forward copies to the state of origin & state of destination.	_____
7.4(a)5v	Generator <u>FAILED</u> to give the remaining copies to hauler.	_____

SECTION 9.

HAZARDOUS WASTES EXPORTATION

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE EXPORT
REQUIREMENTS OF THE REGULATIONS?

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

Generator FAILED to:

- 7.4(b) Notify the EPA of its intent to export. _____
Obtain acknowledgement of consent
from the receiving country. _____
- 7.4(c) Provide the information required in
N.J.A.C. 7:26-7.4 ET. SEQ.to the EPA. _____
- 7.4(c)7 Insure that the acknowledgement is
attached to each manifest. _____
- 7.4(c)8 Deliver a copy of the Manifest to
Customs at the point of departure? _____
- 7.4(g)4 Submit an annual report to the EPA? _____

COMMENTS:

SECTION 10.CONTINGENCY PLAN AND EMERGENCY PROCEDURES

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE CONTINGENCY
PLAN & EMERGENCY PROCEEDURES REGULATIONS? _____ ☒

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

- | | | |
|--------|--|---|
| 9.7(a) | <u>NO</u> written contingency plan. | _____ |
| 9.7(b) | Generator <u>FAILED</u> to implement the plan in an emergency. | _____ |
| 9.7(c) | Plan <u>FAILED</u> to describe the response actions facility personnel and local authorities shall take. | _____ |
| 9.7(d) | Generator has a DPCC or SPCC plan, and <u>FAILED</u> to amend that plan to incorporate hazardous waste management. | _____ |
| 9.7(e) | Plan <u>FAILS</u> to describe arrangements agreed to by local authorities. | _____ <input checked="" type="checkbox"/> |
| 9.7(f) | Plan <u>FAILS</u> to list names, addresses, and phone numbers (office and home) of emergency coordinators. | _____ <input checked="" type="checkbox"/> |
| 9.7(g) | Plan <u>FAILS</u> to include a list, location, AND CAPABILITIES of all emergency equipment. | _____ <input checked="" type="checkbox"/> |
| 9.7(h) | Plan <u>FAILS</u> to describe evacuation procedures, evacuation signal(s) AND routes. | _____ |
| 9.7(i) | Generator <u>FAILED</u> to: | |
| | 1. Keep a copy of the plan at the facility. | _____ |
| | 2. Submit the contingency plan to local authorities. | _____ |

SECTION 11.PERSONNEL TRAINING

IS THE FACILITY IN COMPLIANCE WITH THE
PERSONNEL TRAINING REGULATIONS?

YES NO

____ ☒

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.4(g)2	Training program <u>NOT</u> directed by a person trained in hazardous waste management procedures and, is it <u>NOT</u> designed to ensure that facility personnel are able to respond effectively.	_____
9.4(g)3	Program <u>FAILS</u> to include the following response procedures:	
9.4(g)3i	Use of personnel safety equipment.	_____
9.4(g)3ii	Procedures for using facility emergency and monitoring equipment.	_____
9.4(g)3iii	Key parameters for automatic waste feed cut-off systems.	_____
9.4(g)3iv	Procedures for utilizing communications or alarm systems.	_____
9.4(g)3v	Response procedures for fires & explosions.	_____
9.4(g)3vi	Ground water contamination responds procedures.	_____
9.4(g)3vii	Shutdown procedures.	_____
9.4(g)4	Personnel <u>have NOT</u> successfully completed training within six months of the date of their employment or assignment to a new position at the facility.	_____
9.4(g)5	Personnel do <u>NOT</u> take part in an annual review of training.	_____
9.4(g)6	<u>NO</u> written documentation of the following:	
9.4(g)6i	Job title for each position and the name of the employee filling each job.	_____

9.4(g)6ii	A written job description.	_____
9.4(g)6iii	Description of the training given to personnel.	_____
9.4(g)6iv	Documentation of actual training.	_____
9.4(g)7	Training records are <u>NOT</u> kept.	_____
9.4(g)8	Semi-annual drills, involving all employees and local authorities are <u>NOT</u> conducted.	_____

AND,

9.4(g) 8i Generator **FAILED** to petition the Department for an exemption from the drill requirement.

OR

9.4(g)8ii Generator FAILED to petition the Department for an exemption excluding local officials.

COMMENTS

Faculty does not have a training program at present.

SECTION 12.

PREPAREDNESS AND PREVENTION

IS THE FACILITY IN COMPLIANCE WITH THE
PREPAREDNESS & PREVENTION REGULATIONS?

YES NO

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.6(b) Facility FAILS to have:

9.6(b)1 Communications or alarm system.

9.6(b)2 A telephone or device to summon
 emergency assistance.

9.6(b)3 Portable emergency equipment.

9.6(b)4 Adequate Water supply.

9.6(c) Generator FAILED to test and maintain emergency equipment.

9.6(f) Generator FAILED to:

9.6(f)1 Familiarize Police, fire departments, and emergency response teams with the layout of the facility, & hazardous waste handled.

9.6(f)2 Have an agreement designating primary emergency authority to a specific police and fire department where more than one Police and fire department are involved.

9.6(f)3 Make agreements with emergency response contractors, and equipment supplier. CLEAN VENTURE

9.6(f)4 Make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries result from fires, explosions, or discharges at the facility.

9.6(f)5 Make arrangements with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually.

DFWE 29
REV 02/22/93

9.6(f) 6

Document when authorities identified in (f)1 through 5 above declined to enter into such arrangements.

COMMENTS:

DFWE 29
REV 02/22/93

SECTION 13.

WASTE WATER TREATMENT PLANT SLUDGE

FACILITY _____

EPA ID. No. _____ FILE No. _____

DOES THE FACILITY OPERATE A SLUDGE DRYING UNIT? _____

IF YES, OBTAIN THE FOLLOWING INFORMATION:

1. "WASTE WATER TREATMENT UNIT" QUALIFICATION PER 7:14A-4.3

Is the drying unit part of a waste water treatment facility which is subject to regulation under sections 402 or 307(b) of the federal Clean Water Act? _____

Note: In order to be considered "part of" the facility, the dryer need not be physically connected to the W.W.T. Facility, but must be located at the same site.

Describe the relationship between the dryer and the W.W.T. Facility.

Describe how the sludge is moved from the W.W.T. Facility to the dryer.

Does the drying unit treat a sludge which is generated on site by the wastewater treatment facility? _____

Is the sludge to be treated a regulated hazardous waste as defined at N.J.A.C. 7:26-8? _____

If yes, what is the waste classification code? _____

Does the drying unit meet the definition of a "tank" at N.J.A.C. 7:14A-4.3? _____

Note: "Tank" means a stationary device designed to contain an accumulation of hazardous waste and constructed of non-earthen materials which provide the structural strength to totally contain the waste. Dryers that are integrally equipped with feed or discharge hoppers for treatment of sludge in bulk satisfy the definition of "tank". Others not so designed may still be considered tanks on a case-by-case basis.

Provide a physical description of the drying unit.

2. PRIMARY PURPOSE RESTRICTION

Is the primary purpose of the dryer to dehydrate sludge, AND NOT to destroy sludge in order to produce an ash residue. _____

3. THERMAL INPUT LIMITATION

What is the dryer's maximum volume of sludge that the drying unit can hold? _____

What is the heating capacity of the drying unit in kilowatts or BTU/minute? _____

What is the maximum drying time? _____

What is unit weight of the sludge (lbs/cuft)? _____

THIS INFORMATION SHOULD BE SUBMITTED BY THE INSPECTOR TO BHWE FOR A PERMIT EXEMPTION DETERMINATION.

CONFIDENTIAL - RECOMMENDATIONS

TO: FILE DATE

FROM: _____

SUBJECT: _____

EPA. ID. #: _____ INSPECTION DATE: _____

COMMENTS :

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

add additional pages as needed

DFWE 29
REV 02/22/93

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Central Bureau of Water & Hazardous Waste Enforcement
CN 407, Trenton, N.J. 08625-0407
(609) 584-4200



NOTICE OF VIOLATION

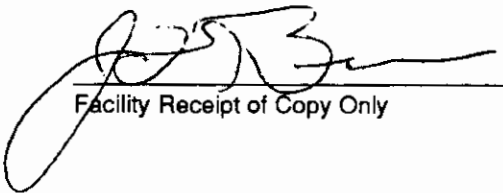
ID NO. NJ0002173151 DATE 7/26/93
NAME OF FACILITY American Cyanamid Co.
LOCATION OF FACILITY 35 Antlers Brook Rd. Woodbridge
NAME OF OPERATOR Jon Berman, P. Manager

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION [±] 9.3(d) 4: Failure of generator to
mark containers with the words "HAZARDOUS WASTE"
(Specifically, the cabinets holding outdated chemicals)
[±] 7.4(a) 4viii: Failure of generator to list special
handling instructions on the manifest (Missing Manifest doc. #'s)
[±] 9.7(e): Failure of contingency plan to describe arrangements
agreed to by local police or fire departments, hospital,
contractors, or state or local emergency response teams.

Remedial action to correct these violations must be initiated immediately and be completed by

8/10/93. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.


Facility Receipt of Copy Only


Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Central Bureau of Water & Hazardous Waste Enforcement
CN 407, Trenton, N.J. 08625-0407
(609) 584-4200

Let's protect our earth



NOTICE OF VIOLATION

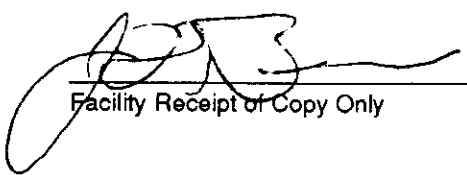
ID NO. NID002173151 DATE 7/26/93
NAME OF FACILITY American Cyanamid Co
LOCATION OF FACILITY 35 Cutlers Park Rd, Woodbridge
NAME OF OPERATOR Jon Brainer, P. Manager

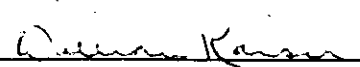
You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION § 9.7(f): Failure of contingency
plan to list name, address, or phone numbers
of persons qualified to act as emergency coordinator.
§ 9.7(g): Failure of contingency plan to list emergency
equipment, updated as required, with its location,
description, or capabilities specified.
§ 9.4(g): Failure of facility owner or operator to
provide required classroom or on-the-job training
for facility personnel.

Remedial action to correct these violations must be initiated immediately and be completed by

8/10/93. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.


Facility Receipt or Copy Only


Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Central Bureau of Water & Hazardous Waste Enforcement
CN 407, Trenton, N.J. 08625-0407
(609) 584-4200



NOTICE OF VIOLATION

ID NO. NJD002173151 DATE 7/26/93
NAME OF FACILITY American Cyanamid Co
LOCATION OF FACILITY 35 Carter Road, Woodbridge
NAME OF OPERATOR John B. P. Manager

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION I 9.6(f). Failure of owner/operator
to make required arrangements with police or
fire departments, emergency response contractors,
equipment suppliers, or local hospitals, or to
document any such authority's refusal of
such arrangements (Specifically, 9.6(f)1, (f)4,
and (f)5.

Remedial action to correct these violations must be initiated immediately and be completed by

8/10/93. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.


Facility Receipt of Copy Only


Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

CYTEC INDUSTRIES
WOODBRIIDGE PLANT
ENVIRONMENTAL PERMITS

Updated on: 07/26/93

Permit Type	Permit Number	Issuing Agency	Permit Issue Date	Permit Renewal Submission Date	Permit Expiration Date	Permit Status
Air	084589	NJDEPE	12/07/81	02/18/95	05/19/95	Active
Air	083183	NJDEPE	04/14/88	01/14/98	04/14/98	Active
Air	016865	NJDEPE	10/01/75	07/03/95	10/01/95	Active
Air	041051	NJDEPE	10/30/78	08/01/98	10/30/98	Active
Air	101553	NJDEPE	06/07/91	03/09/96	06/07/96	Active
Air	019383	NJDEPE	10/01/75	07/03/95	10/01/95	Active
Air	064588	NJDEPE	12/07/81	02/18/95	05/19/95	Active
Air	102937	NJDEPE	09/27/91	N/A	09/15/93	Temporary
Air	041085	NJDEPE	10/10/78	07/12/98	10/10/98	Active
Air	076102	NJDEPE	11/14/86	08/16/96	11/14/96	Active
Air	076103	NJDEPE	11/14/86	08/16/96	11/14/96	Active
Air	108088	NJDEPE	07/31/92	N/A	10/23/93	Temporary
Air	076101	NJDEPE	11/25/86	02/11/94	05/12/94	Active
Air	100137	NJDEPE	03/07/91	N/A	08/21/93	Temporary
Air	106616	NJDEPE	04/22/92	N/A	10/13/93	Temporary
Physical Connection	774	NJDEPE	04/01/92	03/31/93	03/31/93	Active
Water Use Registration	10548W	NJDEPE	10/06/92	Not applicable		Active
NJPDES Ground Water Monitor	1295	NJDEPE	06/20/86	07/04/94	12/31/94	Active
Waste Water Discharge	28091	MCUA*	02/01/90	08/04/97	01/31/98	Active
MCHD Incinerator Permit	001-W-87/90	MCHD**	10/30/87		10/30/93	Active

* MCUA is the Middlesex County Utilities Authority.

** MCHD is the Middlesex County Health Department.

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Form Approved. OMB No. 2050-0039. Expires 9-30-94

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ0002173151		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address American Cyanamid 35 Cuttars Dock Road Woodbridge, New Jersey 07095		4. Generator's Phone (908) 634-3800		5. Transporter 1 Company Name Clean Venture Inc.		6. Transporter 1 US EPA ID Number NJ00982281016		7. Transporter 2 Company Name	
9. Designated Facility Name and Site Address Cycle Chem Inc. 217 South First Street Elizabeth, N.J. 07206		10. US EPA ID Number NJ00022000416		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM WASTE CHEMICAL PROCESS LIQUID NON RCRA NON DOT		12. Containers No. Type 003 DM		13. Total Quantity 01200	
14. Additional Descriptions for Materials Listed Above Liquid Cationic Polyacrylamide-1000		15. Special Handling Instructions and Additional Information Emergency Phone # (908)-442-4900 CVI Job#4438		16. Handling Codes for Wastes Listed Above S, J, P, X, 9, 0, 0		17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: RICHARD DESTEFANO Signature: [Signature] Month Day Year: 03/08/93		18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: [Blank] Signature: [Blank] Month Day Year: [Blank]	
19. Discrepancy Indication Space SALV. RESIDUAL DEPOSITED 3-10-93 FOR FUTURE USE. 5.8 LBS. AM BLSHLE 217 SOUTH FIRST STREET, WOODBRIDGE, NJ 07095 (EPA 1005-1000000000)		20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name: [Blank] Signature: [Blank] Month Day Year: [Blank]		21. Facility's Phone (908) 355-5800		22. State Facility's ID		23. State Trans. ID	



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

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Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ D 0 0 2 1 7 3 1 5 1	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address American Cyanamid 35 Cutters Deck Road - Woodbridge, N.J. 07095		6. US EPA ID Number NJ D 9 8 2 2 8 1 0 1 6		7. State of New Jersey	
4. Generator's Phone (908) 638-3700		8. US EPA ID Number		9. State of New Jersey	
5. Transporter 1 Company Name Clean Venture, Inc.		10. US EPA ID Number		11. State of New Jersey	
7. Transporter 2 Company Name		12. Containers		13. Total Quantity	
9. Designated Facility Name and Site Address Cycle Chem, Inc. 217 S. First St. Elizabeth, N.J. 07206		14. Unit W/Vol		15. Waste No.	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers		13. Total Quantity	
a. Waste Petroleum Mixture Solid Non DOT/Non RCRA Waste Material		No. Type		14. Unit W/Vol	
b. Waste Petroleum Mixture Liquid Non DOT/Non RCRA Waste Material		No. Type		14. Unit W/Vol	
c. Waste Petroleum Mixture Liquid Non DOT/Non RCRA Waste Material		No. Type		14. Unit W/Vol	
d. Waste Chemical Process Solid Non DOT/Non RCRA Waste Material		No. Type		14. Unit W/Vol	
J. Additional Descriptions for Materials Listed Above S, T Absorbent pads, tyvals, gloves 99-100X petroleum hydrocarbons 0-1X L, T No. 6 Oil (Fuel) 0-10X Water 0-10X		K. Handling Codes for Wastes Listed Above S 5 7 S 0 1 S 0 1		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.	
17. Special Handling Instructions and Additional Information (a) 3422188-02001 (b) 3422188-02001 (c) 3422188-02001 (d) 3422188-02001 Emergency phone #908-442-4900 Clean Venture, Inc.		18. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		19. Discrepancy Indication Space	
Printed/Typed Name John D. Berrian		Signature <i>[Signature]</i>		Month Day Year 10 22 92	
Printed/Typed Name Doug Kuntz		Signature <i>[Signature]</i>		Month Day Year 10 22 92	
Printed/Typed Name		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	

EPA Form 8700-22 (Rev. 9/86) Previous editions are obsolete.

3 — TSD MAIL TO - GENERATOR

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 282-5550 (Day) (609) 282-7172 (Night)



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address CLEAN VENTURE, INC. 1000 ROUTE 100 TENTON, NJ 08625						A. State Manifest Document Number NJA 1388235							
4. Generator's Phone () 609-442-4900						B. State Generator's ID SAME							
5. Transporter 1 Company Name CLEAN VENTURE, INC.						C. State Trans. ID NJ00P55011							
6. US EPA ID Number NJ 100 8 2 2 8 1 0 1 6						D. Transporter's Phone () 908 442-4900							
7. Transporter 2 Company Name						E. State Trans. ID							
8. US EPA ID Number						F. Transporter's Phone ()							
9. Designated Facility Name and Site Address CLEAN VENTURE, INC. 1000 ROUTE 100 TENTON, NJ 08625						G. State Facility's ID							
10. US EPA ID Number						H. Facility's Phone () 908 442-4900							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. (Isobutanol/ carbonodithioic acid						x x 1		x x x 5 5				0001	
b.													
c. xanthate drum													
d.													
J. Additional Descriptions for Materials Listed Above L, 1 Isobutanol .5-1.0% Sodium Hydroxide 1.5% a. Sodium Sulfide 1.5% Water 5-10% Carbonodithioic acid 82-84% b. Sodium thiosulfate 2% Sodium thiocarbonate 2%						K. Handling Codes for Wastes Listed Above a. S U 1 c. d.							
15. Special Handling Instructions and Additional Information ERG 27 X T 33 U V - N J 1 6 2 7 1 #908-442-4900 Clean Venture, Inc.													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name JOE D. BERRIAN						Signature <i>[Signature]</i>				Month Day Year 05/1/92			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name ERISON T. KEEBIN						Signature <i>[Signature]</i>				Month Day Year 05/1/92			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space SHEETS 5000000 CARBONATE 10 CLEAN VENTURE 5000000 CARBONATE 10													
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name KEVIN PARR						Signature <i>[Signature]</i>				Month Day Year 05/1/92			

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

NJA 1388235

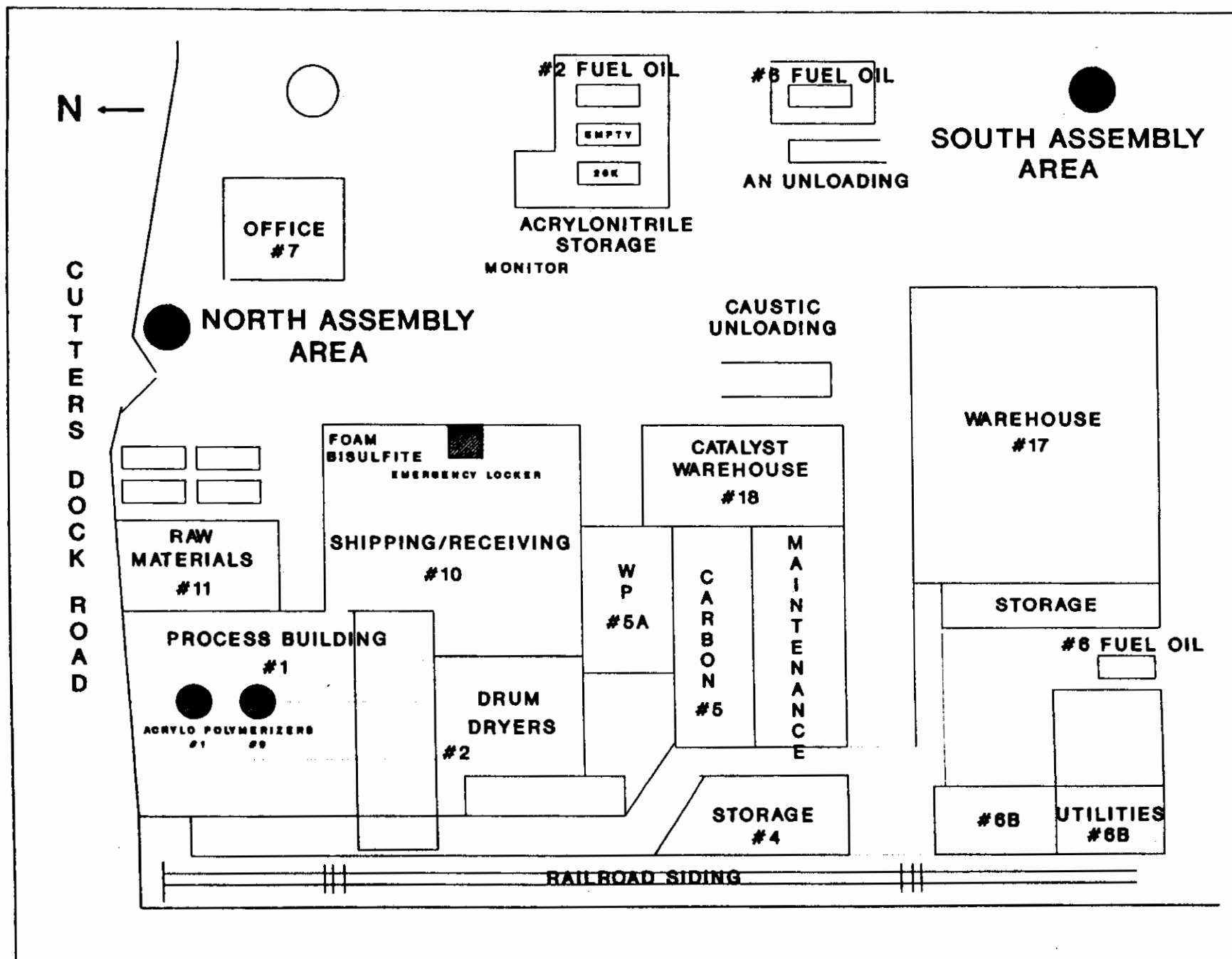


State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address American Cyanamid Co. 35 Cutters Dock Road - Woodbridge, N.J. 07095						A. State Manifest Document Number NJA 1241663							
4. Generator's Phone (908) 634-3800						B. State Generator's ID NONE							
5. Transporter 1 Company Name Clean Venture, Inc.						C. State Trans. ID NJ0015811							
6. US EPA ID Number 1 N J D D R 2 2 8 1 0 1 6						D. Transporter's Phone (908) 442-4900							
7. Transporter 2 Company Name						E. State Trans. ID							
8. US EPA ID Number						F. Transporter's Phone ()							
9. Designated Facility Name and Site Address Cycle Chem, Inc. 217 E. First St. Elizabeth, N.J. 07206						G. State Facility's ID							
10. US EPA ID Number 1 N J D D R 2 2 8 1 0 1 6						H. Facility's Phone (908) 355-5800							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. X (Xylene/Ethanol) Waste Flammable Liquid, n.o.s. Flammable Liquid UN1993 (P003,D001)						b. 2 DEF XXXX 6		c. 6		d. P 0 0 1 F 0 0 3			
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above L. 1. Primary Container - 55 gal. drum 2. Secondary Container - 55 gal. drum 3. Tertiary Container - 55 gal. drum 4. Quaternary Container - 55 gal. drum 5. Quinary Container - 55 gal. drum 6. Selenic Acid 7. Selenic Acid 8. Selenic Acid 9. Selenic Acid 10. Selenic Acid 11. Selenic Acid 12. Selenic Acid 13. Selenic Acid 14. Selenic Acid 15. Selenic Acid 16. Selenic Acid 17. Selenic Acid 18. Selenic Acid 19. Selenic Acid 20. Selenic Acid 21. Selenic Acid 22. Selenic Acid 23. Selenic Acid 24. Selenic Acid 25. Selenic Acid 26. Selenic Acid 27. Selenic Acid 28. Selenic Acid 29. Selenic Acid 30. Selenic Acid 31. Selenic Acid 32. Selenic Acid 33. Selenic Acid 34. Selenic Acid 35. Selenic Acid 36. Selenic Acid 37. Selenic Acid 38. Selenic Acid 39. Selenic Acid 40. Selenic Acid 41. Selenic Acid 42. Selenic Acid 43. Selenic Acid 44. Selenic Acid 45. Selenic Acid 46. Selenic Acid 47. Selenic Acid 48. Selenic Acid 49. Selenic Acid 50. Selenic Acid 51. Selenic Acid 52. Selenic Acid 53. Selenic Acid 54. Selenic Acid 55. Selenic Acid 56. Selenic Acid 57. Selenic Acid 58. Selenic Acid 59. Selenic Acid 60. Selenic Acid 61. Selenic Acid 62. Selenic Acid 63. Selenic Acid 64. Selenic Acid 65. Selenic Acid 66. Selenic Acid 67. Selenic Acid 68. Selenic Acid 69. Selenic Acid 70. Selenic Acid 71. Selenic Acid 72. Selenic Acid 73. Selenic Acid 74. Selenic Acid 75. Selenic Acid 76. Selenic Acid 77. Selenic Acid 78. Selenic Acid 79. Selenic Acid 80. Selenic Acid 81. Selenic Acid 82. Selenic Acid 83. Selenic Acid 84. Selenic Acid 85. Selenic Acid 86. Selenic Acid 87. Selenic Acid 88. Selenic Acid 89. Selenic Acid 90. Selenic Acid 91. Selenic Acid 92. Selenic Acid 93. Selenic Acid 94. Selenic Acid 95. Selenic Acid 96. Selenic Acid 97. Selenic Acid 98. Selenic Acid 99. Selenic Acid 100. Selenic Acid						K. Handling Codes for Wastes Listed Above a. 501 b. c. d.							
15. Special Handling Instructions and Additional Information (a) Product Code 71028-IG 65732 X733UV Emergency phone (908) 442-4900 Clean Venture, Inc.						N.J. DEP 5811							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name Roy K. Rigie						Signature Roy K. Rigie				Month Day Year 12 06 91			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Doug Kuntz						Signature Doug Kuntz				Month Day Year 12 06 91			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space J9JT-1150, ERGH 27													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Signature Month Day Year													



RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility Name: American CyanamidU.S. EPA ID#: NJD002173151 SIC Code: 2821Street: 35 Curtis Dock Rd.City: Woodbridge State: NJ Zip: 07095Telephone #: (908) 634-3800 Telefax #: (908) 634-8326Inspection Date: 7/26/93 Time: 8:50

	Name	Agency/Title	Telephone #
Inspectors:	<u>W. Kauer</u>	<u>NJDEPE / Sr. Env. Spec.</u>	<u>(609) 534-4200</u>

Facility Reps*:	<u>Jon Berrian</u>	<u>Amer. Cyan/Plant Manager</u>
-----------------	--------------------	---------------------------------

* - Primary Environmental Contacts

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
F020-F023 & F026-F028	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
California List	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
First Third	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Second Third	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Third Third	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

WJK/NJDEPE/(4/93)

INSPECTION SUMMARY

Processes that Generate LDR Wastes:

Amer Cyanamid manufactures polymers for water treatment & well drilling operations. Lab research generates small quantities of spent solvents (FA03). A Safety-Kleen parts washer in maintenance generates D001 waste.

Various outdated chemicals are occasionally generated and shipped under a "P" or "U" code. This however is not a regular consistent waste stream.

LDR Waste Management:

Wastes are collected and shipped to various TSD's. Lab waste is collected as a satellite while spent chemicals are managed predominantly as lab packs.

Summary of Potential LDR Violations:

No problems were observed with LDR documentation

Inspector Name and Title: William Kaiser, Senior Environmental Spec.

Signature: William Kaiser

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?

Yes ☒ No ☐

If no, list below:

Assigned Classification

Correct Classification

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments: _____

3. Has multi-source leachate been assigned the F039 waste code [40 CFR 261.31]?

Yes ☐ No ☐ NA ☒

If yes, was single-source leachate combined to form multi-source leachate [55 FR22623]?

Yes ☐ No ☐

Comments: _____

II. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard (* wastewater vs. non-wastewater) for each F-solvent?

Yes ☒ No ☐ NA ☐

If No, list below:

Waste Code

Assigned Classification

Correct Classification

Comments: _____

* < 1% by weight total organic carbon (TOC), < 1% by weight total F001-F005 solvent constituents listed in 40 C.F.R. Table CCWE [40 C.F.R. 268.2(f)(1)]

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard (* wastewater vs. non-wastewater) for each dioxin waste?

Yes _____ No _____ NA ☒

If no, list below:

Waste Code	Assigned Classification	Correct Classification
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments: _____

* < 1% TOC by weight and < 1% total suspended solids (TSS) by weight [40 C.F.R. 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste (i.e. subcategory and wastewater vs. non-wastewater)?

Yes ☒ No _____ NA _____

If no, list below:

Waste Code	Assigned Subcategory	Correct Subcategory	Assigned wastewater vs. nonwastewater designation	Correct wastewater vs. nonwastewater designation
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

* < 1% TOC by weight and < 1% TSS with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 C.F.R. 268.2(f)(2) and (3)]

Comments: _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9(b)]

Yes ☒ No _____ NA _____

- c. Does the generator specify alternative treatment standards for lab packs?

Yes _____ No ☒ NA _____

GENERATOR

If yes, do lab packs only contain the following wastes* ? [40 CFR 268.42(c)(2)]

_____ Organometallics: 40 Part 268, Appendix IV constituents
 _____ Organics: 40 Part 268, Appendix V constituents

* Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?

Yes _____ No _____ NA ☒

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes [55 FR 22675] ?

a. Liquid hazardous wastes containing PCB's \geq 50 ppm

Yes _____ No _____ NA ☒

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCB's

_____ \geq 500 ppm PCB's

b. Listed or characteristic wastes containing \geq 1,000 mg/l (liquids) or mg/kg (non-liquids) HOC's, which are not listed or characterized by the HOC content.

Yes _____ No _____ NA ☒

If yes, check the appropriate treatability group:

_____ Dilute HOC wastewater (1,000 mg/l-10,000mg/l HOCs)

_____ All other HOC's greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain \geq 134 mg/l nickel and/or \geq 130 mg/l thallium.

Yes _____ No _____ NA ☒

5. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes _____ No ☒ NA _____

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method and documentation of approval [40 CFR 268.42(b)].

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____

Comments: _____

6. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes _____ No ☒

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes _____ No _____

Comments: _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation? [268.7(a)]

Yes ☒ No _____

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes _____ No _____

Comments: _____

2. Which of the following analytical methods does the generator employ?

- a. Knowledge of waste:

Yes ☒ No _____

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

D001, F003, D009, P+U codes. Ingredients are known
assuming determination by knowledge

- b. TCLP: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP? (BDAT=stabilization/immobilization technology) Examples: D004-D011, and F001-F009, etc.

Yes _____ No ☒ NA _____

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results [40 CFR 268.7(a)(5)].

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT=destruction/removal technology) Examples: D001-D003, majority of P and U wastes, etc.

Yes _____ No ☒ NA _____

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results [40 CFR 268.7(a)(5)].

- d. PFLT* : Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes _____ No ☒ NA _____

* PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results. [40 C.F.R. 268.7(a)(5)]

3. Does the generator treat restricted wastes in < 90 day tanks or containers regulated under 40 CFR 262.34? (Examples: elementary neutralization, etc)

Yes _____ No ☒ (If No, go to 4)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes _____ No _____

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? [40 CFR 268.7(a)(4)]

Yes _____ No _____ (If No, go to 4)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

_____ Based on a detailed chemical and physical analysis of a representative sample.

_____ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements.

Has the plan been filed with the Regional Administrator (Receipt required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes _____ No _____

Comments: _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

Yes _____ No ☒ (If No, go to b)

List the wastes: _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes _____ No _____

* Prohibited wastes must be treated to established treatment standard prior to land disposal.

Comments: _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes _____ No ☒ (If No, go to c)

Check appropriate category:

_____ Dilutes to meet treatment standards

_____ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? [40 CFR 268.3(b)]

_____ Managed in treatment systems regulated under the Clean Water Act

_____ Non-Toxic* characteristic wastes

_____ Treatment standard specified in 40 CFR 268.41 or 268.43

* Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted:

- c. Based on an assessment of points a. and b. and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes _____ No ☒

Comments: _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes _____ No _____ NA _____

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 days, or disposed on site?

Yes _____ No ☒ (If yes, complete TSD Checklist)

Comments: _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to a NJPDES permit are not prohibited (if applicable)? [55FR 22662]

Yes _____ No _____ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR 268 treatment standards are met*? [40 CFR 268.9(d)]

Yes _____ No _____ NA ☒

- * This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 C.F.R. 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes _____ No ☒ (If No, go to 3)

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes _____ No _____ (If No, go to 3)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes _____ No _____ NA _____

- b. Is a notification sent with each waste shipment?

Yes _____ No _____

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) [SQG only]* ?

Yes _____ No _____ (If No, go to 3)

- * Small quantity generator = generator of greater than or equal to 100 kg/month but less than 1,000 kg/month hazardous waste, or less than 1 kg/month of acutely hazardous waste. (NJ criteria = <100 kg/month of hazardous waste or <1 kg/month of acutely hazardous waste)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler	Waste Code	Subsequent Handler
_____	_____	_____	_____

Did the SQG provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement [40 CFR 268.7(a)(9)]?

Yes _____ No _____

3. Off-Site Management: Waste Meets Treatment Standards

- a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes _____ No ☒ (If No, go to 4)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____

Note: Include documentation supporting the generator's determination that the waste meets applicable treatment standards/prohibition levels.

Does the generator provide a notification and certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]

Yes _____ No _____ (If No, go to D)

- b. Are a notification and certification sent with each waste shipment?

Yes _____ No _____

If no, is the waste subject to a tolling agreement pursuant to 262.20(e)? (SQG only)

Yes _____ No _____ (If No, go to c)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>	<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____	_____	_____

Did the SQG provide a notification and certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes _____ No _____

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes _____ No _____ NA _____ (If No or NA, go to 4)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>	<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____	_____	_____

GENERATOR

Are a notification and certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes _____ No _____

4. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No _____

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes _____ No _____ NA ☒

Do LDR documents reflect proper management of wastes previously covered under case by case extensions?

Yes _____ No _____ NA ☒

Comments: _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes _____ No ☒ (If No, do not complete this section)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment units and processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes _____ No _____

Comments: _____

3. Are residuals further treated, stored for greater than 90 days, or disposed on site?

Yes _____ No _____ NA _____

(If yes, the TSD checklist must be completed)

E. Additional Comments, Concerns, or Issues not addressed in the Checklist:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There is no text or other markings on the paper.

Waste Minimization Checklist

GENERATOR CHECKLIST

=====

MANIFEST

GENERAL 262.20

YES NO N/A

Does the generator, offer for transportation, hazardous waste for off-site treatment/disposal? If yes, proceed to next question. If no, proceed to 264.75/265.75.

☒ ☐ ☐

262.23

Does the generator sign the manifest certification which states;

☒ ☐ ☐

" If I am a large quantity generator, I have a program in place to reduce the volume and toxicity of the waste generated to the degree I have determined to be economically practical and that I have selected the practical method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."

Does the generator have a written Waste Minimization Plan?

☐ ☒ ☐

If no, is the generator able to describe his plan orally.

☒ ☐ ☐

COMMENTS:

(Explain in this space the areas that visually show evidence that a program is in place and is being implemented)

Solvent use is carefully monitored to eliminate wasteful excess.

Outdated chemicals are being investigated to see if they can be ~~reprocessed~~ reprocessed or used in other areas.

ANNUAL/BIENNIAL REPORT

262.41

YES NO N/A

- Has the generator submitted Annual (AR) or Biennial reports (BER) to the appropriate regulatory agency?

☒ ☐ ☐

The inspector should review these reports prior to the inspection (see above), and should try to verify the information in the report during his/her site inspection. The following questions should be addressed during the inspection.

262.56(a)(5)

Does the BER or AR include the efforts undertaken during the year to reduce the volume of toxicity of the wastes generated?

☒ ☐ ☐

Does the BER or AR include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?

☒ ☐ ☐

Do these efforts match the information contained in the generator's written or verbally described waste minimization program.

☒ ☐ ☐

Is the BER or AR certification signed by the generator or authorized representatives?

☒ ☐ ☐

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 4, 2014 - 4:14 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	Activity Location:	None Chosen
Handler ID:	NJD002173151	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 08/04/2014		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:5 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 4, 2014 - 4:14 PM

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CYTEC INDUSTRIES INC

County Name / Code: MIDDLESEX / NJ023

NJD002173151

REGION 02

Location: 35 CUTTERS DOCK ROAD; WOODBRIDGE, NJ 07095

Mailing: 35 CUTTERS DOCK ROAD; WOODBRIDGE, NJ 07095

Activity Location: NJ	State District: CENTRAL	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: Y
Generator: N	Transporter: N	Operating TSDF: ----	IC In Place: N	El Indicator (HE / GW): N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: ----	
Full Enforcement: ----	Converter: ----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkid: Y	State TSDF: ----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Violation:	Activity Location: NJ	Type: 262.B	Determined Date: 07/26/1993	Determined by Agency: State	Responsible Agency: State		
Scheduled Compliance Date: 08/10/1993		Actual Compliance Date: 09/24/1993		RTC Qualifier: OBSERVED	Sequence Number: 1		
FRR Evaluation	09/24/1993	Activity Location: NJ	By: State	Identifier: 000	Person: NJBK	Branch: C	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
CEI Evaluation	07/26/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 07/26/1993	Identifier: 000			
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ			
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:			

Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 07/26/1993	Determined by Agency: State	Responsible Agency: State		
Scheduled Compliance Date: 08/10/1993		Actual Compliance Date: 08/26/1993		RTC Qualifier: OBSERVED	Sequence Number: 2		
FRR Evaluation	09/24/1993	Activity Location: NJ	By: State	Identifier: 000	Person: NJBK	Branch: C	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
CSE Evaluation	08/26/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
CEI Evaluation	07/26/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 07/26/1993	Identifier: 000			
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ			
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:			

Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 07/26/1993	Determined by Agency: State	Responsible Agency: State		
	Scheduled Compliance Date: 08/10/1993		Actual Compliance Date: 09/24/1993	RTC Qualifier: OBSERVED	Sequence Number: 3		
FRR Evaluation	09/24/1993	Activity Location: NJ	By: State	Identifier: 000	Person: NJBK	Branch: C	Found Violation: YES
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	07/26/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 4, 2014 - 4:14 PM

CYTEC INDUSTRIES INC, NJD002173151, WOODBRIDGE, NJ, continued -

Enforcement:	Activity Location: NJ	Type: 120	Action Date: 07/26/1993	Identifier: 000
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:

Evaluations With No Violations:

CEI Evaluation	03/29/2006	Activity Location: NJ	By: State	Identifier: 001	Person: COCR	Branch: C	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	07/31/1995	Activity Location: NJ	By: State	Identifier: 000	Person: NJDG	Branch: C	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	06/01/1990	Activity Location: NJ	By: State	Identifier: 002	Person: R2DEP	Branch:	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	04/17/1984	Activity Location: NJ	By: State	Identifier: 001	Person:	Branch:	Found Violation: NO
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 4, 2014 - 4:14 PM

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Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 4, 2014 - 4:14 PM

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL
262.B	GENERATORS - MANIFEST

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
CSE	COMPLIANCE SCHEDULE EVALUATION
FRR	FINANCIAL RECORD REVIEW

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

* Note: Penalty amount may not reflect all violations cited.